South Dakota Relay Service FCC Certification Renewal

& Supporting Documents

Introduction

The State of South Dakota, the Department of Human Services with the assistance of CSD and Sprint Relay, has prepared this narrative and attached appendices to comply with the FCC TRS Certification Renewal Application, particularly in response to the **FCC Public Notice DA 07-2761, CG Docket No. 03-123** released on June 22, 2007. Included in the Public Notice are the minimum mandatory FCC TRS requirements under **47 C.F.R. §64.604 and §64.605**. A copy of this Public Notice and these mandatory requirements is attached as Appendix A.

As indicated in the opening background, the Department of Human Services contracts with CSD for relay services (See appendix V). CSD, in its continued partnership with SPRINT, continues to provide quality TRS services and features to South Dakota's deaf and hard of hearing population. CSD operates a call center in Sioux Falls, South Dakota and works closely with Sprint as the technology vendor to CSD. This FCC re-certification will reference both CSD and Sprint.

South Dakotans not only benefit from an in-state center located in Sioux Falls, South Dakota, but through Sprint, South Dakota Relay users also have access to services such as Internet Relay (IP) Video Relay (VRS) and Sprint Relay Wireless. Please note that although Sprint Internet Relay and Video Relay Services information is listed throughout this recertification application, South Dakota Relay does not contract to provide these services in South Dakota. South Dakota is not responsible for oversight of IP and VRS services.

The FCC has requested that each FCC TRS Certification Renewal application responds to the minimum mandatory FCC TRS requirements for providing telecommunication relay services and that each state includes procedures and remedies for enforcing any requirements imposed by state programs. Additionally, the FCC requested that several exhibits such as outreach presentations, promotional items, consumer training materials, and consumer complaint logs be included with the information provided.

The Appendices included with this TRS Certification Renewal Application are as follows:

A. Copy of the FCC TRS Public Notice DA 07-2761
B. TRS, STS, IP, VRS Training Outlines
C. TRS, IP, and VRS Pledge of Confidentiality
D. E911 Call Procedure
E. Sprint Carrier of Choice Letter of Invitation
F. Sprint Outage Prevention Program
G. Sprint Disaster Recovery Plan
H. Sprint TRS Standard Features Matrix
I. Sprint Policy on 10 and 15 minute Rule
J. FCC TRS Mandatory Minimum Standards & Compliance Matrix
K. Contact Information for TRS Consumer Information and Complaints
L. Sprint's Report to the FCC on VRS and IP Waivers
M. Sprint Relay Fact Sheet
N. Sprint's TSP Press Release
O. Copy of TRS Information in Telephone Directories
P. Copies of Telephone Bills
Q. Copies of Relay Newsletters
R. Copies of Monthly Outreach Reports
S. Copy of Relay Brochures or Other Advertisements
T. State legislation for TRS program in the State
U. Copies of Complaint Logs from 2002-2007
V. Copy of TRS RFP & Purchase of Service Agreement with CSD
W. Annual TRS Report to the Legislature

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Appendix V: Copy of TRS RFP and Copy of Purchase of Service Agreement with CSD .....
Appendix W: Annual TRS Report to the Legislature .....

Operational Standards

A.1 Communication Assistants (CAs)

§64.604 (a)(1) (i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities

CA Employment Standards

South Dakota contracts with CSD to provide oversight of CA's. CSD has established a successful procedure to attract qualified applicants for TRS CA positions. The first step in the CA's hiring practice is a validated test that screens for typing, language skills, and other skills related to the CA position. When an applicant passes the test, a Human Resources representative screens the applicant over the phone or in person, for oral communication skills and work availability. If the applicant passes this step, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. If the supervisor recommends the applicant for employment, the applicant undergoes a drug screen and security/reference check. This process ensures that only qualified applicants are hired to work at a relay center.

Sprint IP (Internet Relay) CAs follow the same employment and training standards as CSD TRS CAs.

All Sprint Video Relay (VRS) Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct. For more information about VRS interpreter qualifications and training expectations, see Appendix B.

§64.604 (a)(1)(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

Communication Assistants Training Program

CSD trainers use adult learning theories; training is adapted to each participant's learning modality; incorporating lecture, visual graphics, flow charts, videos, role playing, and hands-on-call training, to stimulate the CA's ability to learn.

New hires receive training in Deaf Culture, ASL translation, the needs of non-signing deaf individuals, and sensitivity to the needs of persons with hearing and speech disabilities by a qualified person who, if not deaf or hard of hearing, possesses extensive knowledge in this area. During the CA's initial training, they are trained and evaluated on how to accurately reflect the TTY user's communication and on the CA's role in the relay process. CAs' performance based skills such as grammar; spelling and oral communication abilities are evaluated. CSD works closely with local deaf and hard of hearing communities to

identify knowledgeable presenters to assist with the training. CSD utilizes videos, role-playing, group activities and discussion groups to educate employees on the different needs of their customers to ensure sensitivity towards customers.

Additionally, applicants are given written and hands-on evaluations to demonstrate their ability to spell and type accurately, process a call using live training terminals, and role-play in varying levels of ASL. CAs also receive extensive training on how to improve their interpersonal skills so that they can work effectively with difficult and stressful situations that may arise during their employment. These training mandates and skill expectations also apply to Sprint IP CAs and VRS interpreters where appropriate. Please review the Sprint TRS, Speech to Speech (STS), and Video Relay Service (VRS) Training outlines in Appendix B.

A team of ASL-Fluent Sprint employees developed the ASL Training workbooks that are utilized by CAs for ongoing training. These workbooks have been designed to provide supplemental training and to assist CAs toward the mastery of ASL translation on relay calls.

CA Quality Assurance Programs

Monthly Surveys

CSD conducts monthly surveys and formal reviews to monitor and evaluate the continuing training for South Dakota Relay TRS CAs as well as Sprint IP CAs. The survey process used is a product of a task force comprised of management staff. It evaluates all areas of work performance, personal effectiveness and attendance. The survey process goals are to respond to customer feedback and provide the CA with clearly defined and objective performance measures. Two surveys are completed on each CA every month and include areas such as Typing Accuracy, Spelling, Conversational English/ASL Translation, Clarity / Enunciation, Caller Control, and Etiquette/Composure.

Quality Assurance Test Calls

To ensure that all CAs are focused on FCC requirements and state contractual commitments, CSD centers and or an independent third party quality testing firm has been retained by CSD to perform a total of 700 test calls. Results are provided on a quarterly basis. Feedback and appropriate guiding performance measures for specific components are addressed with each CA.

Relay Program Management and Trainer Test Calls

Additionally, the Operations department and members of the Relay Program Management Team identify areas of concern based on customer feedback, state feedback, individual survey results and customer contacts. Approximately 300 test calls per month are conducted focusing on the identified monthly call-processing topic. Results are compiled and shared with Operations'

management. Based on the results, the trainers and management determine if refresher training is required and what method will be used for delivery.

§64.604 (a)(1)(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

Transmission of 60 WPM

All CSD CAs type a minimum of 60 words per minute (WPM). CSD utilizes an oral-to-type test that simulates actual working conditions. CAs are tested on an ongoing basis to ensure that a 60 WPM performance requirement is maintained. During this test, CSD does not use technology-aided transmission to ensure the typing speed. The scores for each CA are the actual words per minute that are typed. The most recent test results were an overall 82.5 WPM with 97% accuracy for all call centers. This applies to Sprint IP and IP wireless relay CAs as well.

CSD utilizes technological aides during relaying such as pre-programmed macros and auto-correcting software, along with the CA's natural skill, to provide optimal service.

§64.604 (a)(1)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Qualified VRS interpreters

All Sprint Video Relay (VRS) Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct. For more information about VRS interpreter qualifications and training expectations, see Appendix B.

§64.604 (a)(1) (v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

In-Call Replacement of CAs

CSD requires all CAs, including Sprint IP and IP Wireless CAs, and VRS Interpreters, also known as Video Interpreters (VIs), to stay on the call for a minimum of 10 minutes, with the exception of Speech to Speech (STS) CAs, who must stay on the call for a minimum of 15 minutes. This is included in the CA training matrix under Appendix B, Module 4I, and the Video Relay Service Training Outline and Qualifications.

§64.604 (a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

When a South Dakota relay user requests a CA of the opposite gender of the CA who initially receives the call, the relay user is switched to an appropriate CA as soon as one becomes available. If a change of CA is necessary during the call, every attempt will be made to accommodate the previous gender request. When a Sprint VRS and Sprint IP or IP Wireless user requests a specific gender, every attempt will be made to honor the request. If a change of VIs is necessary during the call, every attempt will be made to accommodate the previous gender request.

§64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.

CSD CAs transmit and relay all conversations between the caller and the called parties in real time.

A.2 Confidentiality and Conversation Context

§64.604 (2)(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

Confidentiality Policies and Procedures

As outlined, South Dakota contracts with CSD to oversee all TRS CAs. CSD believes that measures to ensure confidentiality are crucial to the success of TRS, Sprint IP/IP Wireless and VRS operations and has implemented procedural and environmental measures to safeguard customer and call information.

In accordance with the FCC regulations, all information provided for the call set-up, including customer database records remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs and Video Interpreters (VIs) lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the Relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes.

The only exception to this policy relates to STS calls. CSD STS Relay Agents may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call.

CSD confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. CSD strictly enforces confidentiality policies in the Center, which include the following:

- Prospective CAs and VIs undergo a thorough background investigation and screening.
- During initial training, CAs and VIs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs and VIs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All CSD Relay Centers have security key access.
- Visitors are not allowed in Relay work areas.
- Supervisors are present in the work area to observe behavior.
- All Relay Center personnel are required to sign and abide by the CSD Relay Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

CSD Center's Agreement Regarding Confidential Customer Information requires CAs and VIs to:

- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

Please refer to Appendix C for the TRS Pledge of Confidentiality. This document is similar to what is used for Sprint VRS interpreters and IP/IP Wireless CAs.

STS Limited Exception of Retention of Information

At the request of a caller, CSD Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. No information is kept after the inbound call is released from the CA position.

§64.604 (2)(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

Verbatim Relay and the Translation of ASL

CSD CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered, and at all times during the conversation, unless either relay user specifically requests summarization or ASL interpretation.

At the request of the relay user, CSD CAs will translate written ASL into conversational English. All CSD CAs are able to translate the typed languages of relay users whose primary language may be ASL or whose written English language skills are limited to conversational grammatically correct English. Training is provided on various levels of English/ASL during the initial training, as well as throughout a CAs' employment. In order to finish training successfully, the CA must demonstrate competent skills to translate the calls as requested.

Sprint VRS interpreters and Sprint IP/IP Wireless CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.

STS Facilitation of Communication

CSD STS CAs receive training on how to facilitate STS communication without interfering with the independence of the user. STS CAs are evaluated monthly on their ability to facilitate the call without altering content of the conversation or

compromising the user's control. South Dakota Relay users have full control of all of their relay calls.

A.3 Types of Calls

§64.604 (3) (i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

South Dakota Relay Services

South Dakota Relay, provides 24 hour, 7 day-a-week Telecommunication Relay Service (TRS) for standard (voice), Text Telephone (TTY), wireless, or personal computers (PC) users to place local, intrastate, interstate, and international calls. South Dakota Relay also processes calls to directory assistance and to toll free numbers. There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing South Dakota Relay retain full control of the length and number of calls placed anytime through relay. Sprint IP/IP Wireless CAs and VRS interpreters are also prohibited from refusing single or sequential calls or limiting the length of calls using relay services.

§64.604 (3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call. (iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied. (iv)Relay services shall be capable of handling pay-per-call calls.

South Dakota Relay, through CSD, works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. CSD processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. South Dakota Relay will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

When a TRS call is placed through South Dakota Relay, the user will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, time in between calls and wrap-up time) on toll calls. Billing will occur within 60 days of the call date. South Dakota Relay gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. CSD will process calling cards offered by the user's carrier of choice if the carrier is a participant of South Dakota's Carrier of Choice (COC) program and as long as Feature Group D is at the Carrier's access tandem. CSD works with the LECs and IXCs to compile and make available to all TTY users in South Dakota a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and

invoicing of toll calls placed through the relay. Sprint was the first provider to process pay-per-calls, beginning with the state of Texas in 1996.

Sprint VRS, Sprint IP and IP Wireless are waived from these requirements. Please refer to the Sprint VRS and IP Report to the FCC, Appendix L.

§64.604 (3)(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

South Dakota Relay provides access to all available relay call types. A complete list of all call types proved by CSD and Sprint may be found in Appendix H, Sprint Standard Features Matrix. Most call types are waived by the FCC for IP and VRS users. Please refer to the Sprint VRS and IP Report to the FCC, Appendix L.

§64.604(3)(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

Call Release Functionality

TTY to TTY Call Release Functionality allows the CA to connect two TTY users and then drop off the line, leaving the two TTY customers connected. This is especially useful for customers needing to use a pre-paid calling card, reach another TTY user through a switchboard or operator, or when needing to speak with a voice user first.

Frequently Dialed Numbers

Frequently Dialed Numbers, sometimes referred to as Speed Dial Numbers, allow relay users to store up to 10 frequently called numbers in their customer preference database along with a name for each entry. When initiating a call the user can then provide the name to CSD CAs, instead of the entire 10-digit number.

Three-Way Calling

Customers who have purchased three-way calling from their LEC can use the feature when placing a call through Relay. This feature allows a customer to add a third party to a TRS call. For example, a TTY caller places a call to the Relay and then bridges another TTY person on his or her line. The original TTY caller then requests to place a call to a voice user. The CA will make the connection and Relay the call between the voice party and both TTY users. This process would also apply if there were two voice customers and one TTY user on the line.

§64.604(3)(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

When a South Dakota Relay caller reaches an answering machine, voice mail or interactive menu, the CA informs the relay caller by hitting a macro which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress. The CA then, if necessary, presses a hot key to record the voice announcement and relay the message back to the caller. The CA utilizes CSD's recording technology to obtain all information necessary on the first attempt. The CA relays all of the recorded information to the customer and deletes the recorded message. This technology greatly reduces the CA work time, as the CA does not need to make multiple outdials. In addition, South Dakota relay callers are only charged for the first call. Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. Sprint has developed a procedure using our Ultra WATS lines to ensure that with additional out-dials the customer does not incur toll charges.

Callers to South Dakota Relay services access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone.

The South Dakota Relay 900 number is 900-246-3300.

§64.604 (a) (3)(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

South Dakota Relay TRS, Sprint IP/IP Wireless and VRS VIs provide both answering machine and voice mail retrieval. Please refer to Appendix H, Standard Call Features Matrix.

Answering Machine

CSD CAs will inform relay users when reaching an answering machine, voice mail or interactive menu. The CA will hit a "hot key" which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress.

When reaching a recorded message, the CA utilizes recording technology to obtain all information necessary on the first attempt. The CA can then play back the recording at a pace that allows them to relay the entire message to the caller, after which the recorded message is deleted. This technology greatly reduces the CA's work time and accordingly, time billed to the State.

The CA will type the entire outgoing message verbatim including the option for the Relay User to leave a message, if applicable.

The CA will leave the relay user's message in the appropriate mode of communication. South Dakota Relay has the capability to leave messages in both voice, text and touch tones (pagers).

Once the CA has left the message on the answering machine or voice mail, the CA will send a pre-programmed response to the relay caller stating:

(UR MSG LEFT) CA XXXXM/F GA

Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. Sprint has developed a procedure using our Ultra WATS lines to ensure that with additional outdials, the South Dakota customer does not incur toll charges. Customers will only be charged for the first call.

Voicemail Retrieval

South Dakota Relay has the capability to retrieve messages from answering machines by placing an outbound call to a remote location or the same location. When a user requests to retrieve messages at the same location, the CA will instruct the user when to take the handset off the hook and when to begin playing back the messages. The CA will retrieve all messages and relay verbatim. The recorded message will be automatically deleted by the system once the relay call is completed.

A.4 Handling of Emergency Calls

§64.604(a)(4) Handling of emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

Through CSD, South Dakota Relay meets the requirements of emergency calls by immediately routing 911 calls to an appropriate Public Service Answering Point (PSAP) that the caller would have reached by dialing 911 directly, or a PSAP that is capable of dispatching emergency services in an expeditious manner. With one CA keystroke, CSD's intelligent CA application utilizes the

NPA/NXX information of the inbound caller to immediately cross-reference this information to a national database containing the ten-digit emergency number for every PSAP. Within seconds, this number is entered in the dial window and the call is then immediately initiated.

South Dakota Relay considers an emergency call to be one in which the user of the Relay Service indicates they need the police, fire department, paramedics or ambulance. CSD utilizes a standard E911 database that serves all of the United States and has uniform procedures, as noted below, which are followed at every CSD and Sprint Relay Center.

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a hot key.
- The CA terminal will post a query containing the caller's ANI to the E911 database.
- The E911 database currently responds with the telephone number of an appropriate PSAP; automatically dials the PSAP number and passes the caller's ANI to the E911 Service Center.
- The CA will remain on the line and will verbally pass the caller's ANI to the E911 Service Center Operator.

Relay users will be encouraged to dial 911 as their primary means of contacting Emergency Services. However, if a Relay user makes an emergency call through Relay, the CSD CA will make every effort to correctly route the call to an appropriate PSAP based on the network and user-provided information. As required by the FCC, CAs will remain on the line and give the Emergency Service Provider the caller's telephone number, even if the caller is no longer on the line.

It is South Dakota Relay's opinion that in some emergencies, valuable time could be lost if the TTY call were to be transferred to the PSAP, and the results could be life threatening. Therefore, CSD will allow direct TTY-to-TTY communication in the following scenarios, if allowed by the FCC:

- At the request of the caller,
- At the request of the PSAP Operator or PSAP Supervisor,
- The CA will remain connected and will silently monitor the call, if:
- The PSAP is not capable of receiving and conversing directly with the caller in the modality of the caller (i.e. if the caller is using a communication modality other than TTY, [i.e., VCO, HCO, STS, ASCII, VRS, or Internet Relay]), or
- The CA is having technical trouble transferring the call to the PSAP (i.e., the caller is disconnected from the PSAP; the PSAP cannot establish a TTY connection, etc.).

The CA will assist, as necessary, to maintain communications between the PSAP and the caller. Otherwise, the CSD CA will remain on the line to provide assistance as necessary to facilitate communication for all emergency calls and will not disconnect until the call has been completed.

911 services are currently waived for IP and VRS providers. Sprint strongly encourages Internet Relay users to dial 911 directly to receive prompt emergency services via TTY or phone.

Sprint IP via website permits manual 911 processing. If user tell operator to dial 911, operator will request supervisor assistance. User will need to provide the address and city where he/she is calling from. Supervisor will call Directory Assistance (on separate phone call) to obtain 10-digit emergency PSAP number. Then the supervisor will pass it to CA to make outbound call to 911 dispatcher (PSAP). It can take few minutes or so to get the information. Users are encouraged to enter a 10-digit emergency number on the website for more efficient call processing.

More information about South Dakota's procedure for handling E911 calls may be found in Appendix D.

Telecommunications Service Priority Program

Sprint announced on October 31, 2005, that it had completed all milestones in enrolling its Telecommunications Relay Service (TRS) in the FCC's Telecommunications Service Priority (TSP) program. On May 11, 2005, Sprint began implementing TSP throughout its network. On October 31, Sprint successfully activated all 14 call centers under the TSP program. Sprint's participation in the TSP Program strengthens their already robust reliability.

In 1988, the TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service requests, such as after a natural disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

The Sprint TRS network is designed to reroute traffic to other Sprint Relay centers across the country to provide uninterrupted service. However, if a national or regional emergency causes service to be disrupted and the relay call center is unable to receive or place calls, Sprint's participation in the TSP program means that Local Exchange Carriers (LECs) are required to restore service to the relay call center as rapidly as possible consistent with the priority status assigned to the relay call center. Unlike other TRS providers, when a disaster occurs, Sprint TRS has the ability to reroute calls immediately to unaffected relay call centers and continue processing calls with minimal customer impact.

The Sprint relay call centers participating in TSP are:

- Albuquerque Switch (Albuquerque, NM and Honolulu, HI)
- Austin Switch (Austin, TX and Lubbock, TX)
- Dayton Switch (Dayton, OH and Cayce, SC)
- Independence Switch (Independence, MO)
- Jacksonville Switch (Jacksonville, FL)
- Lemoore Switch (Lemoore, CA)
- New Jersey Switch (Vineland, New Jersey)
- Sioux Falls Switch (Sioux Falls, SD and Moorhead, MN)
- Syracuse Switch (Syracuse, NY and Holyoke, MA)

The TSP program ensures that the Sprint relay call centers are placed on a priority basis to re-establish telephone service for Relay South Dakota users. Sprint is proud to voluntarily comply with the FCC's TSP program. Please see Appendix N for a copy of the general press release regarding the TSP program.

A.5 STS Called Numbers

§64.604 (a)(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

CSD's Relay customer database is available to South Dakota Speech-to-Speech (STS) users. The database can be used to store a list of names, frequently dialed telephone numbers, and customer notes. The database automatically appears on the CA's terminal screen each time a user dials into one of the relay numbers. The customer database helps to facilitate call set up and conversing preferences for the STS user. Customer profile information contained in the CSD Customer Database will be transferred to any new provider at the end of the contract term. Currently, STS is waived from Internet Relay, and Video Relay services.

Technical Standards

B.1 ASCII and Baudot

§64.604 (b) Technical standards—(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

Through CSD, South Dakota Relay meets all technical standards.

Each CSD CA position is capable of receiving and transmitting in voice, Baudot including TurboCode™ and E-TurboCode™ as well as ASCII codes. Upon a call being received at the CA position, TTY signals are automatically identified as

either Baudot or ASCII; if ASCII, the baud rate is detected. Intelligent modems allow the CA to handle either voice or data lines from the same CA work station.

This automatic identification of call types for incoming calls provides a quick and efficient technique for varied customer input and reduces the average CA work time to a minimum.

ASCII rates up to and including 19,200 bps are supported by the Sprint platform. The domestic TTY baud rate of 45.5 and the international rate of 50 baud are also supported.

Sprint IP currently provides services via ASCII connection.

B.2 Speed of Answer

§64.604 (2) Speed of answer. (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

CSD has developed the capability to effectively manage a human resource pool that provides unsurpassed quality. CSD has gained valuable experience in sizing its TRS Operations to accommodate contract requirements. Historical call detail is gathered by 15-minute periods throughout the years of providing TRS service. This historical information is combined with state-specific information to establish anticipated call patterns that accurately predict the personnel needs necessary to efficiently process the relay calls.

Through CSD, South Dakota Relay meets the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) CSD will ensure that no more than 30 seconds elapses between the receipt of the dialing information and the dialing of the requested number.

CSD samples the average answer time a minimum of every 30 minutes for each 24-hour period. Sprint's Traffic Management Control Center (TMCC) and our Enhanced Services Operations Control Center (ESOCC) are staffed with professionals who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

The Centers that serve South Dakota are provided with sufficient facilities to provide a Grade of Service (GOS) of P.01 or better for calls entering the South Dakota call center switch equipment. Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes.

Performance of inbound traffic on each toll-free number where it enters the network is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state. In addition, the dedicated trunk facilities that route the call from the terminating network switch to the ACD (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations. The data is monitored for both short- and long-term trends to ensure the most cost-effective use of resources.

Sprint also meets requirements for Sprint IP/IP Wireless and VRS. Sprint does not put calls in a queue or on hold. Abandoned calls are included in the speed-of–answer calculation.

§64.604 (b) (2) ((ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Through CSD, South Dakota Relay has met the requirement of answering 85% of all calls within 10 seconds on a daily basis by a live CA. (Abandoned calls are included in this 85/10 Service Level calculation.) CSD samples the average answer time a minimum of every 30 minutes for each 24-hour period. CSD currently samples every 15 minutes.

Through CSD, South Dakota Relay is committed to providing relay users with functionally equivalent telecommunication services as that enjoyed by standard telephone users. To this end, Sprint will continue to answer 85% of all relay calls within 10 seconds. There will be no more the 30 seconds of elapsed time between receipt of dialing information and the dialing of the requested number.

CSD begins measuring speed-of-answer at the time the call hits the Relay switch. Calls are answered by a live CA and are not to be placed in a queue or on hold after reaching the Relay switch.

CSD's Service Level calculation for TRS

CSD's Service Level calculation for all TRS calls, is described below:

Number of calls handled < 10 seconds / (total calls handled + total calls abandoned)

The SVL is the number of calls handled in 10 seconds or less divided by the total number of calls offered.

(Number of calls offered = total number of calls handled + total number of calls abandoned),

(SVL = Number of calls handled in < 10 / Number of calls offered).

CSD's Weighted Service Level for TRS

CSD uses a 'weighting' process to combine the results of several Call Centers into a single result:

The 'weighted' service level (SVL) is a calculation that multiplies the number of 'State' calls handled in each center by the center's daily SVL (the outcome is a factor called 'SVL points'). The resultant 'SVL points' for each center that handled that 'State' traffic is then summed. The sum of the 'SVL points' is then divided by the total number of 'State' calls to get a daily 'weighted' SVL.

CSD will answer 85% of all calls within 10 seconds on a daily basis and will not place a caller in queue or on hold. The ten seconds begins at the time the call is delivered to the CSD Relay Center and CSD will ensure that adequate network facilities are available to avoid the possibility of a busy response due to loop trunk congestion.

§64.604 (b) (ii) (A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

CSD considers the call delivered when the Relay Center's equipment accepts the call from the LEC, and the public switched network actually delivers the call to the TRS Center.

Sprint furnishes the necessary telecommunications equipment, facilities, and system software for the complete TRS operation. Sprint is a certified Interexchange Carrier (IXC) in all 50 states. Sprint's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

§64.604 (b) (ii) (B) Abandoned calls shall be included in the speed-of-answer calculation.

Please see (b)(2)(ii) above.

§64.604 (b) (ii) (C) A TRS provider's compliance with this rule shall be measured on a daily basis.

Please see (2) (b)(ii) above.

§64.604 (b) (ii) (D) The system shall be designed to a P.01 standard.

Sufficient transmission facilities have been provided to service all South Dakota traffic levels, including busy hour peaks. Through CSD and Sprint's technology, South Dakota Relay utilizes trunks that are sized to provide a busy hour Grade of Service (GOS) of P.01 or a minimum of 99 out of 100 calls will have unrestricted and immediate access to the call center facilities during the busiest time of day.

Inbound calls that may be blocked within the Public Switched Telephone Network (PSTN) will receive a voice recording stating that all circuits are busy and to try the call again within a few minutes.

In addition, the dedicated trunk facilities that route the call from the terminating network switch to the ACD (Automatic Call Distributor) at the serving relay center are monitored daily for compliance with blockage limitations.

CSD ensures no greater than 1% blockage on a daily basis which offers South Dakota Relay customers the advantages of a superior digital fiber network unsurpassed in the industry. Through use of leading switch technology and SONET network survivability techniques, CSD's network ensures a very low level of call interruption or blockage.

The network switch architecture is non-hierarchical, that is, all switches are directly interconnected. Sprint switches are processor-controlled using advanced digital technology and are virtually non-blocking. A call across the network passes over Inter Machine Trunks (IMT) which are engineered at P.01 Grade of Service (GOS) at the busy hour to allow for maximum network call completion. The P.01 GOS requirements ensure that at least 99% of calls to the Relay Center will reach a CA. The Local Exchange Carrier (LEC) network typically utilizes a P.01 grade of service also, and similar blockage rates should apply on their facilities.

§64.604 (b) (ii) (E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Performance of inbound traffic on each toll-free number where it enters the CSD network or relay center facility is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state.

§64.604 (b) (iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

Sprint Relay complies with this requirement. Please refer to Sprint Relay's report to the FCC under Appendix L.

B.3 Equal Access to Interexchange Carriers

§64.604 (b) (3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

CSD provides South Dakota callers with the ability to have their intrastate, interstate and international calls carried by any Interexchange carrier who has agreed to participate in the South Dakota Carrier of Choice (COC) program. When a caller indicates their COC preference, the CA will verify that the requested carrier is a COC participant, if they are, the call will be routed accordingly. Callers will be able to use any billing method made available by the requested carrier including collect, third party, prepaid and calling cards.

The current participating members of CSD Carrier of Choice program are:

AT&T Communications
Bell South Long Distance
Bestline
Birch Telecom
Broadwing Communications
Broadwing Telecommunications
Cox Communications
Excel Telecommunications, Inc.
Global Crossings Telecommunications
MCIWorldCom
McLeod USA
Qwest Communications
SBC Communications Long Distance
Souris River Telecommunications
Sprint
Telecomm*USA (MCIWorldCom)
Touch America Services, Inc.
U.S. Link
VarTec dba Clear Choice Communications
VarTec Telecom, Inc.
Verizon Long Distance
Winstar
Working Assets
WorldCom
WorldXChange

If a South Dakota caller does not indicate a COC preference to the CA either on-line or in their customer database (or if their preferred carrier is not a COC participant), the call will be carried over the Sprint network. As with calls carried by Sprint, most COC participants limit billing methods based on the type of line from which the call originates. When the requested carrier is not a COC participant, CSD has established a procedure where the carrier will be notified, verbally and in writing, of its obligation to provide access to TRS users and encourage their participation.

Please see Appendix E for a sample of the Carrier of Choice letter sent to carriers when a customer has a preferred interexchange carrier that does not participate in the COC program.

B.4 TRS Facilities

§64.604 (b)(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

South Dakota Relay and CSD Relay Customer Service are both available 24 hours a day, every day of the year. Through CSD, South Dakota utilizes both UPS and backup power generators to ensure that the relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. The generators can stay in service for longer periods of time as long as fuel is available. Sprint IP/IP Wireless and VRS

§64.604 (b)(4) (ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

CSD Relay Network Support Plan

Service Reliability

Sprint's service is provided through an all-fiber sophisticated management control network that support backbone networks with digital switching architecture. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes.

A 100 percent fiber-optic network provides critical advantages over the other carriers. These advantages include:

Quality

Since voice and data are transmitted utilizing fiber optic technology, the problems of outdated analog and even modern microwave transmission simply do not apply. Noise, electrical interference, weather-impacting conditions, and fading are virtually eliminated.

Economy

The overall quality, architecture, and advanced technology of digital fiber optics make transmission so dependable that it costs us less to maintain, thereby passing the savings on to our customers.

Expandability

As demand for network capacity grows, the capacity of the existing single-mode fiber can grow. Due to the architecture and design of fiber optics, the capacity of the network can be upgraded to increase 2,000-fold.

Survivability

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to South Dakota, and a competitive differentiation of the Sprint network.

Network switched services are provided via 49 Northern Telecom DMS-250/300 switches at 29 locations nationwide. Three DMS-300s located at New York, NY; Fort Worth, TX; and Stockton, CA, serve as international gateways. The remaining 46 switches provide switching functions for Sprint's domestic switched services.

Interconnection of the 49 switches is provided in a non-hierarchical manner. This means that inter-machine trunk (IMT) groups connect each switch with all other switches within the network. Each of these IMT groups is split and routed through the Sprint fiber network over SONET route paths for protection and survivability. As an extra precaution to preclude any call blockage, Dynamically Controlled Routing (DCR) provides an additional layer of tandem routing options when a direct IMT is temporarily busy.

Reliability is ensured through a corporate commitment to maintain or surpass our system objectives. Beginning with the network design, reliability and efficiency are built into the system. Sprint continues to improve the network's reliability through the addition of new technologies.

The effectiveness of this highly reliable and survivable network is attributed to the redundant transmission and switching hardware configurations, SONET ring topology, and sophisticated network management and control Centers. These

factors combine to assure outstanding network performance and reliability for South Dakota.

Network Criteria

System Capacity

The Sprint network was built with the capacity to support every interLATA and intraLATA call available in the US. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

Service Restoration

Sprint provides for the restoration of service in the event of equipment malfunctions, isolated network overloads, major network disruptions and national/civil emergency situations. In the event of service disruption due to Sprint's equipment, service typically is restored within four hours after notification. Sprint does everything possible to prevent a total outage at its switch sites or at any of its' POPs through the use of advanced site designs. All processors, memory, and switch networks within our switches are fully redundant. All switch sites are protected by uninterruptible power supplies and halon systems planned in conjunction with local fire departments. Most of our new sites are earth sheltered to increase survivability. A multi-pronged program is used to minimize outages:

Do everything possible to minimize the impact of a "single point of failure." This includes:

- Diversification of all facilities' demands between switch sites. All switch sites are connected to the long haul network over at least two separate Sprint fiber routes; many have three paths.

- Deployment of multiple switches at large switching Centers. This prevents a single switch outage from disabling the site.

- Have systems in place allowing for the rapid redeployment of network resources in case of a catastrophic outage. Fiber cuts, which can affect thousands of calls at several locations, are sometimes unavoidable. Response to these outages is maximized through the following procedures:

- Utilization of established plans to respond effectively to these outages.

- The capability to rapidly deploy network transmission facilities when needed.

- Immediate execution of alternate routing in the digital switches and cross-connect systems to assist in the handling of temporary network disruptions and forced overloads.

- The entire spectrum of survivability needs, expectations, and requirements can be met by the proper engineering of customer and Sprint switches and facilities.

Fiber Backbone Loop Topology and Reconfiguration

Fiber optic cable routes are designed to include redundant capacity to insure survivable fiber optic systems. Sprint's SONET network, using four-fiber bi-directional line switched ring capability, allows automatic switching to alternate paths to provide for traffic rerouting in the event of a route failure. The SONET fiber optic backbone topology is currently designed with more than 100 overlapping rings to ensure sufficient alternate paths for total network survivability.

Please see Appendix F for Sprint's Route Outage Prevention Programs. Also, please refer to the Disaster Recovery Plan provided in Appendix G for a complete explanation of Sprint's back-up plan.

B.5 Technology

§64.604 (b)(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

Through Sprint, South Dakota Relay is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability.

In order to achieve functional equivalence, Sprint will continue to provide Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Sprint receives calling party identifying information including blocking information, from all Relay users. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller as well as other SS7 call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information

- Sprint passes through the calling party information (rather than 711 or the number of the Relay Center)

Sprint meets all minimum technological standards regarding Video Relay Service. Sprint VRS is available through www.sprintVRS.com and sprintrelay.tv (for Videophone users).

On 31 July 2006, Sprint launched **MySprintVRS number.** This **MySprintVRS Number** feature empowers Deaf and hard of hearing Video Relay Service (VRS) users with a simple means of receiving incoming calls With MySprintVRS Number, a hearing user simply dials one toll free number and quickly reaches an Interpreter who connects them to the Deaf or hard of hearing VRS user without supplying any additional information.

The value of a dedicated personal number is generally taken for granted. Without a dedicated personal number, things such as entering a contact number in a department email directory or printing one simple number on a business card are much more complicated. Today telephone numbers are also used as account identifiers or for ordering items. Sprint, unlike most other VRS providers, makes this possible.

For VRS users who have not registered for MySprintVRS, hearing callers may dial a general access toll-free number and provide the VI with the VRS user's IP Address, or their Sprint VRS Mail extension number.

On 28 October 2006, Sprint also introduced a revolutionary means of wirelessly accessing Sprint VRS mail. Sprint, as a telecommunications provider, is uniquely positioned to make retrieval of VRS mail from wireless devices possible from devices with Windows Media Player capability. ***Sprint VRS Mail for wireless devices*** is extremely popular and empowers VRS users to access and playback VRS message directly from their handset.

In addition to providing SprintIP Relay Services, Sprint is also proud to offer the Deaf and Hard-of-Hearing community with cutting-edge technology using Sprint IP using AIM®. Sprint IP is capable of blending the easy-to-use capabilities of Sprint IP Relay with the power of wireless devices and equipment that run AIM®. In addition to the ability to place a relay call over the internet, the wireless user can access Sprint IP on a wireless device with AIM. This service allows users to access relay from the park, a restaurant, or even the airport – anywhere a wireless device can access the internet and AIM.

For more information on technology provided through Sprint Relay, please refer to Appendix M: Sprint Relay Fact Sheet.

B.6 Caller ID

§64.604 (b) (6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through,

to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

Through Sprint, South Dakota Relay offers a network-based Caller ID for all outbound calls which traverse over Sprint's integrated Services Digital Network (ISDN) and SS7 with FGD network. This feature supports Caller ID for all local and long distance calls. In all cases in which it is received Sprint forwards the calling party's ANI (Automatic Number ID) to the terminating LEC for long-distance calls utilizing Sprint's Feature Group D trunks (FGD). As with standard telecommunications, the terminating LEC may or may not choose to use this ANI information as Caller ID information and pass this on to the terminating number. When passed through, the relay call recipient will be able to see the caller's phone number on their caller ID display (the caller ID option feature must first be purchased through their LEC). When not passed through, as with standard telecommunications, the call recipient will receive a message such as "OUT OF AREA" or "CALLER UNKNOWN."

Functional Standards

C.1 Consumer Complaint Logs

§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

CSD provides copies of each TRS Customer Contact form, which includes the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to South Dakota. Further, CSD maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the CSD States.

By June 15th of each calendar year, CSD submits a copy of 12-month complaint log report for the period of June 1- May 31 to the CSD relay administrators. South Dakota Relay then files an annual complaint log to the FCC as required in the minimum functional standards.

C.2 Contact Persons

§64.604 (c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.

Pursuant to 47 C.F.R. section 64.604(c)(2) the Point of Contact information for any complaints, grievances, inquiries and suggestions identified on the FCC Website for South Dakota is correct. Appendix K submitted to the FCC June, 2003 confirmed this information.

South Dakota Relay callers may file intrastate complaints or commendations pertaining to South Dakota Relay services through the following contact:

Janet Ball
Deaf Services Program Specialist
Department of Human Services
Hillsview Properties Plaza
3800 E Hwy, c/o 500 E Capitol, Pierre, SD 57501
V/TTY 605-773-4547; Fax: 605-773-5483
Toll Free Voice: 800-265-9684
E-mail: janet.ball@state.sd.us

C.3 Public Access to Information

§64.604 (3) Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

Outreach is an important component of the South Dakota TRS program and provides the public with pertinent information concerning TRS. It not only provides deaf and hard of hearing individual's informative updated information

regarding services available to meet their telecommunication needs but also targets the general public, business, educational facilities, health facilities and state government. Brochures specific to Native American populations, comic books target children, and displays and informational packets identifying all age groups are utilized.

South Dakota Relay contracts with CSD for outreach development and activities. Each year, $100,000 is designated towards ensuring that all South Dakotans are given information regarding the TRS programs. The South Dakota Relay Administrator works closely with CSD on all outreach activities.

CSD developed an umbrella campaign which included the tag line “Be Heard Be Understood”. This theme has been used on billboards which are currently displayed across South Dakota. This theme has also been used in brochures, websites, radio scripts, and print. CSD also added Don’t Hang Up informational packets which provided a balanced theme for both hearing and deaf/hard of hearing individuals.

South Dakota has a Relay South Dakota homepage available at www.southdakotarelay.com which highlights VCO Direct, Eturbo, IP Relay, TTY, Voice, Speech to Speech, Hearing Carry Over, Additional Features, and 711. This link is also available on South Dakota's deaf services home page at http://dhs.sd.gov/drs/deafserv/deaf.aspx.

CSD also designed a new, updated version of the Telecommunications Equipment Distribution Program (TEDP) with one TEDP brochure specifically identifying South Dakota’s Native American Population.

CSD continues to provide South Dakota with a well rounded campaign including: website maintenance and updates; advertising in newspapers, billboard, TV/Radio Campaigns; mailing cards announcing 711 and bill inserts; exhibits at powwows, outdoor health fair, state and county fairs, town hall meetings, stock shows, and outdoor events; through promotional items such as event canopies and polo shirts, for staff, highlighting South Dakota Relay; and promotional give away items such as comic books, refrigerator magnets, business cards, pens and pencils, note pads, various pamphlets and brochures, and information in South Dakota's Phone Directory. New TV ads have been developed and we continue to work with major TV and radio stations promoting information regarding TRS and new features. South Dakota airs ads on Kelo AM, KWRY, Fox TV and other stations to for both paid advertising and to arrange public service announcement (PSA).

Below is a list of the attachments related to outreach and outreach activities:
Appendix O: Copy of TRS Information in Telephone Directories
Appendix P: Copies of Telephone Bills
Appendix Q: Copies of Relay Newsletters

Appendix R: Copies of Monthly Outreach Reports
Appendix S: Copies of Outreach Materials

C.4 Rates

§64.604 (4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination

As required in South Dakota's RFP (Appendix V) South Dakota Relay users are charged no more for services than for those charges paid by standard "voice" telephone users. South Dakota Relay users, who select Sprint as their interstate carrier, will be rated and invoiced by Sprint. The caller will only be billed for conversation time. Those users, who select a preferred interstate carrier via the South Dakota Relay COC list, will be rated and invoiced by the selected interstate carrier.

By FCC jurisdiction, Sprint has two separate Message Telephone Service rates – one for interstate and one for intrastate. The table below exhibits the discounted rates off Sprint's Message Telephone System (MTS) rates.

	Intrastate	Interstate
Day (7 AM – 6:59 PM)	35%	50%
Evening (7 PM – 10:59 PM)	25%	50%
Night/weekend (11 PM – 6:59 AM; all day Saturday & Sunday)	10%	50%

C.5 Jurisdictional Separation of Costs

§64.604 (5) Jurisdictional separation of costs—(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended (ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and

intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

All South Dakota relay intrastate and interstate minutes are reported separately and distinctly to the state on the CSD invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State of South Dakota. On individual customer invoices, Sprint deducts minutes that the National Exchange Carrier Association (NECA) would reimburse. These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free and 900. In accordance with FCC rules, States receive only a 51% deduction for Toll Free and 900 minutes since this is what NECA would reimburse. For NECA reimbursement, Sprint uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to NECA for reimbursement.

South Dakota Telecommunication Relay was established by the 1989 Session of the South Dakota State Legislature. Amendments were made to the TRS statute by the 1997 Session of the South Dakota State Legislature to impose surcharge on wireless telecommunications and to create a separate fund to purchase telecommunications equipment for individuals with other disabilities. Services are provided to individuals with disabilities who are, otherwise, prevented from using a regular telephone. Attached is a copy of the State Legislation regarding establishment of the TRS program for South Dakota, Appendix T.

An access fee of fifteen cents is imposed on each local exchange service line, each cellular telephone, and each radio pager unit device per month. Each local exchange subscriber pays service; each cellular telephone or radio pager service subscriber to the service provider, the access fee to the local exchange service; each cellular telephone or radio pager service subscriber to the service provider, unless the subscriber is otherwise exempt from taxation. The access fee is reported as a separate line item and collected on the regular monthly bill by each local exchange company or other service provider operating in the State of SD.

On or before the last day of the month following each two month period, every telecommunication company must remit the access fee collections to the State of SD / Department of Revenue. Following reporting periods:

Jul/Aug Due September 30

Sept/Oct Due November 30

Nov/Dec Due January 31

Jan/Feb Due March 31

Mar/Apr Due May 31

May/Jun Due July 31

Every Telecommunication Company will utilize the forms/report as identified by the SD Department of Human Services. The SD Department of Revenue deposits the funds into the State Treasury and notifies the SD Department of Human Services (DHS) / Office of Budget & Finance (BF) of each days deposits. The SD DHS / BF than cash receipts the funds from the State Treasury into the Telecommunication Relay Services fund within the Division of Rehabilitation Services. Each month the SD DHS / BF assures that 10% of the funds receipted, go into the Telecommunication fund for other disabilities or commonly referred to as the Telecommunication Access Devices (TAD) fund.

Collections are reviewed after every 2-month reporting period and a Delinquent Accounts report is prepared and disseminated to various individuals within the DHS. Delinquent accounts that are identified are the responsibility of the SD Department of Revenue to attempt to collect. The SD Department of Revenue has also made this fund part of the audit program, when they are auditing various companies for sales tax, contractors excise tax, etc.

Per Codified Law § 49-31-53 Annual review of access fee – Report to legislature the Department of Human Services is subject to annual review. Each year the department shall report to the legislature and recommend whether the access fee should be increased or decreased in order that the money raised by the access fee pays for the costs of the program. Annul report to the legislature is Appendix W.

C.6 Complaints

§64.604 (6) (i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

CSD has a comprehensive Customer Complaint Tracking program. A supervisor or Operations Administrator is available 24 hours a day to accept complaints, document and forward documentation to the proper source for resolution. Supervisors provide immediate feedback to both the customer and the CA.

CSD provides copies of each TRS Customer Contact form, including the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to South Dakota. Further, CSD maintains a log of each individual complaint and

provides comprehensive reports on a monthly and annual basis to each of the CSD States.

The complaint resolution procedure outlines the steps to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments.
- Handle all service type complaints.
- Resolve complaints with Communication Assistants.
- Follow up with customers if requested by the customers.

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The state-assigned Relay Program Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Relay Program Manager for resolution and follow-up with the customer. South Dakota customers also have the option of calling our 24-hour Customer Service department (1-800-676-3777) or the South Dakota Relay Program Manager to file complaints or commendations.

CSD has the capability to transfer the caller on-line to the Customer Service department. A Customer Service representative will always answer the calls live. The assigned Relay Program Manager is responsible for tracking all commendations and complaints and sending copies of Customer Contacts to the State Relay Administrator by the invoice due date of the following month. To assist customers in identifying contact information for complaints, the toll-free Customer Service number and other contact information is included on all brochures and Outreach materials, including relay web sites.

Sprint Relay submits all Interstate Relay (Sprint IP, IP Wireless) and Video Relay Service complaints directly to the FCC from June 1-May 31st of each year by the July 1st deadline.

South Dakota follows the same complaint procedures to ensure complaints are resolved in 180 days. South Dakota annually submits all complaints from June 1st – May 31st to the FCC by the required July deadline identified by the FCC.

Attached is a copy of South Dakota's Annual Consumer Complaint Log Records from 2002 through 2007 as Appendix U.

C.7 Treatment of TRS Customer Info

(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

The Sprint Customer Preference Database includes items such as types of call, billing information, speed dialing, slow typing, carrier of choice, as well as emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes are included in the customer profile.

As identified and required in South Dakota's TRS RFP, should a different TRS vendor be selected to provide relay services for the State in the future, the TRS vendor awarded a contract as a result of this RFP shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days before the Contractor's last day of service provision.

At the end of the ensuing contract(s) CSD will transfer all South Dakota database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format.

§64.605 State Certification

(a) (1) Certified state program. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "TRS State Certification Application." All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.

South Dakota strives to meet or exceed all operational, technical, and functional minimum standards contained in 47 C.F.R. §64.604. South Dakota makes available adequate procedures and remedies for enforcing the state program as outlined in this certification renewal application and in no way conflicts with

federal law. As evidence that South Dakota is committed to meeting the minimum TRS requirements attached is a copy of South Dakota's TRS RFP as Appendix V.

Per Codified Law § 49-31-51. Access fee imposed on local exchange service lines, cellular telephones and radio pager devices - Report of fee on monthly bills - Report on and remission of fees - Disposition of funds collected. "The access fee shall be reported as a separate line or service and collected on the regular monthly bill by each local exchange telecommunications company or other service provider operating in this state" Per Legislative Mandate a copy of phone bills reflecting the TRS surcharge is attached as Appendix P. Also attached is a SD Codified Law as Appendix T.

South Dakota Relay does not provide Video Relay Services or Internet Relay services for the state of South Dakota. Although there are references to Sprint Relay IP and Sprint Relay VRS services, South Dakota Relay does not contract to provide these services, nor does South Dakota Relay oversee these services for the state of South Dakota.

§64.605 (f) Notification of Substantive Change

(1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

South Dakota had one change to their TRS programs. The contact person for TRS Consumer Information & complaints changed. A notification of this change is attached as Appendix K.

As outlined in the introduction of this re-certification application, South Dakota is currently in the process of writing an RFP for Captioned Telephone Voice-Carry-Over Relay services and plans to offer this enhanced service in the near future. Per §64.605 (f) Notification of Substantive Change,
South Dakota will notify the FCC when Captel Services become available in South Dakota or with any other substantive changes in the South Dakota Relay Program.

Appendix A: FCC TRS Public Notice, June 22, 2007

PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: http://www.fcc.gov
TTY: 1-888-835-5322

DA 07-2761
June 22, 2007

CONSUMER & GOVERNMENTAL AFFAIRS BUREAU REMINDS STATES THAT CURRENT TELECOMMUNICATION RELAY SERVICE (TRS) CERTIFICATION WILL EXPIRE ON JULY 26, 2008, AND PROVIDES A TIMELINE FOR SEEKING RECERTIFICATION

CG Docket No. 03-123

The current TRS certifications for all states and territories will expire on July 26, 2008. Under the TRS regulations, states can apply for "renewal" one year prior to expiration, *i.e.,* July 26, 2007. 47 C.F.R. § 64.605(c).

BACKGROUND

TRS enables persons with hearing and speech disabilities to access the telephone system to communicate with voice telephone users. Congress created the TRS program in Title IV of the Americans with Disabilities Act of 1990 (ADA), codified at Section 225 of the Communications Act of 1934. 47 U.S.C. § 225. Under the statute, TRS services are intended to be functionally equivalent to voice telephone service. The TRS regulations set forth mandatory minimum standards that TRS providers must follow in offering service, and are intended to ensure that TRS meets the functional equivalency mandate. *See* 47 C.F.R. §64.604 (set forth in the attached Appendix).

Because the states have primary responsibility for the oversight and compensation of intrastate TRS, the regulations also set forth the process by which state TRS programs may be certified. 47 C.F.R. § 64.605; *see also* 47 U.S.C. §§ 225(c) & (d)(3)(B). The state certification process is intended to ensure that TRS is provided in a uniform manner throughout the United States and territories. The relevant sections of § 64.605 are set forth in the Appendix.

APPLICATIONS FOR CERTIFICATION:

Applications for certification (or renewal of certification) may be filed with the Commission beginning July 26, 2007. All certified state TRS programs are

required to provide traditional (TTY-based) TRS, interstate Spanish language traditional TRS, and Speech-to-Speech (STS) service. If a state program also offers Internet Protocol (IP) Relay, Video Relay Service (VRS), Captioned Telephone Service, or IP Captioned Telephone Service, the state must also demonstrate that it provides these services consistent with the rules.

Although there is no deadline for filing, renewal applications should be filed by October 1, 2007, to give the Commission time to review and rule on the applications prior to the expiration of the prior certification.

Applications for certification are reviewed to determine whether the state TRS program has sufficiently documented that it meets all of the applicable mandatory minimum standards set forth in Section 64.604. If the program exceeds the mandatory minimum standards, the state must certify that the program does not conflict with federal law.

PROCEDURES FOR FILING: All filings must reference CG Docket No. 03-123.

Electronic Filers: Filings may be filed electronically using the Internet by accessing the ECFS: http://www.fcc.gov/cgb/ecfs/. Follow the instructions provided on the website for submitting electronic filings.

- For ECFS filers, if multiple docket or rulemaking numbers appear in the caption of this proceeding, filers must transmit one electronic copy of the filing for each docket or rulemaking number referenced in the caption. In completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket or rulemaking number. Parties may also submit an electronic filing by Internet email. To get filing instructions, filers should send an email to ecfs@fcc.gov, and include the following words in the subject line or body of the message: get form <your email address>. A sample form and directions will be sent in response.

Paper Filers: Parties who choose to submit by paper must submit an original and four copies of each filing on or before October 1, 2007. To expedite the processing of complaint log summaries, states and interstate TRS providers are encouraged to submit an additional copy to Attn: Diane Mason, Federal Communications Commission, Consumer & Governmental Affairs Bureau, 445 12th Street, SW, Room 3-A503, Washington, D.C. 20554 or by email at Diane.Mason@fcc.gov. Parties should also submit electronic disk copies of their certification filing on a standard 3.5 inch diskette or CD-Rom formatted in an IBM compatible format using Word 2003 or compatible software. The electronic media should be submitted in "read-only" mode and must be clearly labeled with the state's name, the filing date and captioned "TRS Certification Application."

Filings can be sent by hand or messenger delivery, by electronic media, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (although we continue to experience delays in receiving U.S. Postal Service mail). The Commission's contractor will receive hand-delivered or messenger-delivered paper filings or electronic media for the Commission's Secretary at 236

Massachusetts Avenue, NE, Suite 110, Washington, D.C. 20002. The filing hours at this location are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of before entering the building. Commercial and electronic media sent by overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743. U.S. Postal Service first-class mail, Express Mail, and Priority Mail should be addressed to 445 12th Street, SW, Washington, D.C. 20554. All filings must be addressed to the Commission's Secretary, Marlene H. Dortch, Office of the Secretary, Federal Communications Commission, 445 12th Street, SW, Room TW-B204, Washington, D.C. 20554.

SUMMARY OF STATE TRS PROGRAM CERTIFICATION TIMELINE:

DATE	ITEM	FCC ACTION
October, 2007	Public Notices are issued indicating that applications have been received by the Commission and seeking comment	**Public Notices** are released seeking comment on the filing. Comments due within 30 days and then an additional 15 days for reply comments.
September 2007 – May 2008	Applications for TRS recertification are reviewed for compliance with 47 C.F.R. §§ 64.604 & 64.605.	**Deficiency letters** are sent to request additional information that demonstrates compliance with the mandatory minimum requirements.
May - July, 2008	Public Notices informing states that their applications for recertification have been reviewed and certification has been renewed.	**Public Notice**

ADDITIONAL INFORMATION

A copy of this *Public Notice* and related documents are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW., Suite CY-A257, Washington, D.C. 20554, (202) 418-0270. These documents also may be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW., Room CY-B402, Washington, D.C. 20554. Customers may contact BCPI at their web site: www.bcpiweb.com or by calling 1-800-378-3160. Filings also may be found by searching on the Commission's Electronic Comment Filing System (ECFS) at http://www.fcc.gov/cgb/ecfs (insert CG Docket No. 03-123 into the Proceeding block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY). This *Public Notice* also can be downloaded in Word or Portable Document Format (PDF) at: http://www.fcc.gov/cgb/dro.

For further information regarding this *Public Notice*, please contact Diane Mason, Consumer & Governmental Affairs Bureau, Disability Rights Office, at (202) 418-7126 (voice), (202) 418-7828 (TTY), or e-mail at Diane.Mason@fcc.gov.

APPENDIX

RELEVANT RULES:

§64.604 MANDATORY MINIMUM STANDARDS[1]

The standards in this section are applicable December 18, 2000, except as stated in paragraphs (c)(2) and (c)(7) of this section.

(a) *Operational standards*—(1) *Communications assistant (CA).* (i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.

(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

(v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

(vii) TRS shall transmit conversations between TTY and voice callers in real time.

(2) *Confidentiality and conversation content.* (i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the

[1] Note that some of these requirements have been waived for certain forms of TRS.

conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

(3) *Types of calls.* (i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.

(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

(iv) Relay services shall be capable of handling pay-per-call calls.

(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

(4) *Handling of emergency calls.* Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

(5) *STS called numbers.* Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

(b) *Technical standards*—(1) *ASCII and Baudot.* TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

(2) *Speed of answer.* (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in

a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

(B) Abandoned calls shall be included in the speed-of-answer calculation.

(C) A TRS provider's compliance with this rule shall be measured on a daily basis.

(D) The system shall be designed to a P.01 standard.

(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

(iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

(3) *Equal access to interexchange carriers.* TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

(4) *TRS facilities.* (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

(5) *Technology.* No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 *et seq.*

(6) *Caller ID.* When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

(c) *Functional standards*—(1) *Consumer complaint logs.*(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.

(ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

(2) *Contact persons.* Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:

(i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;

(ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and

(iii) The physical address to which correspondence should be sent.

(3) *Public access to information.* Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

(4) *Rates.* TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.

(5) *Jurisdictional separation of costs*—(i) *General.* Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended.

(ii) *Cost recovery.* Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

(iii) *Telecommunications Relay Services Fund.* Effective July 26, 1993, an Interstate Cost Recovery Plan, hereinafter referred to as the TRS Fund, shall be administered by an entity selected by the Commission (administrator). The initial administrator, for an interim period, will be the National Exchange Carrier Association, Inc.

(A) *Contributions.* Every carrier providing interstate telecommunications services shall contribute to the TRS Fund on the basis of interstate end-user telecommunications revenues as described herein. Contributions shall be made by all carriers who provide interstate services, including, but not limited to, cellular telephone and paging, mobile radio, operator services, personal communications service (PCS), access (including subscriber line charges), alternative access and special access, packet-switched, WATS, 800, 900, message telephone service (MTS), private line, telex, telegraph, video, satellite, intraLATA, international and resale services.

(B) *Contribution computations.* Contributors' contribution to the TRS fund shall be the product of their subject revenues for the prior calendar year and a contribution factor determined annually by the Commission. The contribution factor shall be based on the ratio between expected TRS Fund expenses to interstate end-user telecommunications revenues. In the event that contributions exceed TRS payments and administrative costs, the contribution factor for the following year will be adjusted by an appropriate amount, taking into consideration projected cost and usage changes. In the event that contributions are inadequate, the fund administrator may request authority from the Commission to borrow funds commercially, with such debt secured by future years' contributions. Each subject carrier must contribute at least $25 per year. Carriers whose annual contributions total less than $1,200 must pay the entire contribution at the beginning of the contribution period. Service providers whose contributions total $1,200 or more may divide their contributions into equal monthly payments. Carriers shall complete and submit, and contributions shall be based on, a "Telecommunications Reporting Worksheet" (as published by the Commission in the Federal Register). The worksheet shall be certified to by an officer of the contributor, and subject to verification by the Commission or the administrator at the discretion of the Commission. Contributors' statements in the worksheet shall be subject to the provisions of section 220 of the Communications Act of 1934, as amended. The fund administrator may bill contributors a separate assessment for reasonable administrative expenses and interest resulting from improper filing or overdue contributions. The Chief of the Consumer & Governmental Affairs Bureau may waive, reduce, modify or eliminate contributor reporting requirements that prove unnecessary and require additional reporting requirements that the Bureau deems necessary to the sound and efficient administration of the TRS Fund.

(C) *Data collection from TRS Providers.* TRS providers shall provide the administrator with true and adequate data necessary to determine TRS fund revenue requirements and payments. TRS providers shall provide the administrator with the following: total TRS minutes of use, total interstate TRS minutes of use, total TRS operating expenses and total TRS investment in general accordance with part 32 of the Communications Act, and other historical or projected information reasonably requested by the administrator for purposes of computing payments and revenue requirements. The administrator and the Commission shall have the authority to examine, verify and audit data received from TRS providers as necessary to assure the accuracy and integrity of fund payments.

(D) [Reserved]

(E) *Payments to TRS providers.* TRS Fund payments shall be distributed to TRS providers based on formulas approved or modified by the Commission. The administrator shall file schedules of payment formulas with the Commission. Such formulas shall be designed to compensate TRS providers for reasonable costs of providing interstate TRS, and shall be subject to Commission approval. Such formulas shall be based on total monthly interstate TRS minutes of use. TRS minutes of use for purposes of interstate cost recovery under the TRS Fund are defined as the minutes of use for completed interstate TRS calls placed through the TRS center beginning after call set-up and concluding after the last message call unit. In addition to the data required under paragraph (c)(5)(iii)(C) of this section, all TRS

providers, including providers who are not interexchange carriers, local exchange carriers, or certified state relay providers, must submit reports of interstate TRS minutes of use to the administrator in order to receive payments. The administrator shall establish procedures to verify payment claims, and may suspend or delay payments to a TRS provider if the TRS provider fails to provide adequate verification of payment upon reasonable request, or if directed by the Commission to do so. The TRS Fund administrator shall make payments only to eligible TRS providers operating pursuant to the mandatory minimum standards as required in §64.604, and after disbursements to the administrator for reasonable expenses incurred by it in connection with TRS Fund administration. TRS providers receiving payments shall file a form prescribed by the administrator. The administrator shall fashion a form that is consistent with parts 32 and 36 procedures reasonably tailored to meet the needs of TRS providers. The Commission shall have authority to audit providers and have access to all data, including carrier specific data, collected by the fund administrator. The fund administrator shall have authority to audit TRS providers reporting data to the administrator. The formulas should appropriately compensate interstate providers for the provision of VRS, whether intrastate or interstate.

(F) TRS providers eligible for receiving payments from the TRS Fund are:

(*1*) TRS facilities operated under contract with and/or by certified state TRS programs pursuant to §64.605; or

(*2*) TRS facilities owned by or operated under contract with a common carrier providing interstate services operated pursuant to §64.604; or

(*3*) Interstate common carriers offering TRS pursuant to §64.604; or

(*4*) Video Relay Service (VRS) and Internet Protocol (IP) Relay providers certified by the Commission pursuant to §64.605.

(G) Any eligible TRS provider as defined in paragraph (c)(5)(iii)(F) of this section shall notify the administrator of its intent to participate in the TRS Fund thirty (30) days prior to submitting reports of TRS interstate minutes of use in order to receive payment settlements for interstate TRS, and failure to file may exclude the TRS provider from eligibility for the year.

(H) Administrator reporting, monitoring, and filing requirements. The administrator shall perform all filing and reporting functions required in paragraphs (c)(5)(iii)(A) through (c)(5)(iii)(J) of this section. TRS payment formulas and revenue requirements shall be filed with the Commission on May 1 of each year, to be effective the following July 1. The administrator shall report annually to the Commission an itemization of monthly administrative costs which shall consist of all expenses, receipts, and payments associated with the administration of the TRS Fund. The administrator is required to keep the TRS Fund separate from all other funds administered by the administrator, shall file a cost allocation manual (CAM) and shall provide the Commission full access to all data collected pursuant to the administration of the TRS Fund. The administrator shall account for the financial transactions of the TRS Fund in accordance with generally accepted accounting principles for federal agencies and maintain the accounts of the TRS Fund in accordance with the United States Government Standard General Ledger. When the administrator, or any independent auditor hired by the administrator, conducts audits of providers of services under the TRS program or contributors to the TRS Fund, such audits shall be conducted in accordance with generally accepted government auditing standards. In administering the TRS Fund, the administrator shall also comply with all relevant and applicable federal financial management and reporting statutes. The administrator shall establish a non-paid voluntary advisory committee of persons from the hearing and speech disability community,

TRS users (voice and text telephone), interstate service providers, state representatives, and TRS providers, which will meet at reasonable intervals (at least semi-annually) in order to monitor TRS cost recovery matters. Each group shall select its own representative to the committee. The administrator's annual report shall include a discussion of the advisory committee deliberations.

(I) *Information filed with the administrator.* The administrator shall keep all data obtained from contributors and TRS providers confidential and shall not disclose such data in company-specific form unless directed to do so by the Commission. Subject to any restrictions imposed by the Chief of the Consumer & Governmental Affairs Bureau, the TRS Fund administrator may share data obtained from carriers with the administrators of the universal support mechanisms (*See* 47 CFR 54.701 of this chapter), the North American Numbering Plan administration cost recovery (*See* 47 CFR 52.16 of this chapter), and the long-term local number portability cost recovery (*See* 47 CFR 52.32 of this chapter). The TRS Fund administrator shall keep confidential all data obtained from other administrators. The administrator shall not use such data except for purposes of administering the TRS Fund, calculating the regulatory fees of interstate common carriers, and aggregating such fee payments for submission to the Commission. The Commission shall have access to all data reported to the administrator, and authority to audit TRS providers. Contributors may make requests for Commission nondisclosure of company-specific revenue information under §0.459 of this chapter by so indicating on the Telecommunications Reporting Worksheet at the time that the subject data are submitted. The Commission shall make all decisions regarding nondisclosure of company-specific information.

(J) The administrator's performance and this plan shall be reviewed by the Commission after two years.

(K) All parties providing services or contributions or receiving payments under this section are subject to the enforcement provisions specified in the Communications Act, the Americans with Disabilities Act, and the Commission's rules.

(6) *Complaints*—(i) *Referral of complaint.* If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously.

(ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

(iii) *Jurisdiction of Commission.* After referring a complaint to a state entity under paragraph (c)(6)(i) of this section, or if a complaint is filed directly with a state entity, the Commission shall exercise jurisdiction over such complaint only if:

(A) Final action under such state program has not been taken within:

(*1*) 180 days after the complaint is filed with such state entity; or

(*2*) A shorter period as prescribed by the regulations of such state; or

(B) The Commission determines that such state program is no longer qualified for certification under §64.605.

(iv) The Commission shall resolve within 180 days after the complaint is filed with the Commission any interstate TRS complaint alleging a violation of section 225 of the Act or

any complaint involving intrastate relay services in states without a certified program. The Commission shall resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

(v) *Complaint procedures.* Complaints against TRS providers for alleged violations of this subpart may be either informal or formal.

(A) *Informal complaints*—(*1*) *Form.* An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau by any reasonable means, such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.

(*2*) *Content.* An informal complaint shall include the name and address of the complainant; the name and address of the TRS provider against whom the complaint is made; a statement of facts supporting the complainant's allegation that the TRS provided it has violated or is violating section 225 of the Act and/or requirements under the Commission's rules; the specific relief or satisfaction sought by the complainant; and the complainant's preferred format or method of response to the complaint by the Commission and the defendant TRS provider (such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate the complainant's hearing or speech disability).

(*3*) *Service; designation of agents.* The Commission shall promptly forward any complaint meeting the requirements of this subsection to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Such designation shall include a name or department designation, business address, telephone number (voice and TTY), facsimile number and, if available, internet e-mail address.

(B) *Review and disposition of informal complaints.* (*1*) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail.

(*2*) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on the informal complaint may file a formal complaint with the Commission pursuant to paragraph (c)(6)(v)(C) of this section.

(C) *Formal complaints.* A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, DC 20554 and shall contain:

(*1*) The name and address of the complainant,

(*2*) The name and address of the defendant against whom the complaint is made,

(*3*) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and

(*4*) The relief sought.

(D) *Amended complaints.* An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.

(E) *Number of copies.* An original and two copies of all pleadings shall be filed.

(F) *Service.* (*1*) Except where a complaint is referred to a state pursuant to §64.604(c)(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.

(*2*) All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of §1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.

(G) *Answers to complaints and amended complaints.* Any party upon whom a copy of a complaint or amended complaint is served under this subpart shall serve an answer within the time specified by the Commission in its notice of complaint. The answer shall advise the parties and the Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.

(H) *Replies to answers or amended answers.* Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.

(I) *Defective pleadings.* Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.

(7) *Treatment of TRS customer information.* Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

[65 FR 38436, June 21, 2000, as amended at 65 FR 54804, Sept. 11, 2000; 67 FR 13229, Mar. 21, 2002; 68 FR 50977, Aug. 25, 2003; 69 FR 5719, Feb. 6, 2004; 69 FR 53351, Sept. 1, 2004; 69 FR 55985, Sept. 17, 2004; 69 FR 57231, Sept. 24, 2004; 70 FR 51658, Aug. 31, 2005; 70 FR 76215, Dec. 23, 2005]

§64.605 STATE CERTIFICATION.

(a) *State documentation*—(1) *Certified state program.* Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "TRS State Certification Application." All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.

(2) *VRS and IP Relay provider.* Any entity desiring to provide VRS or IP Relay services, independent from any certified state TRS program or any TRS provider otherwise eligible for compensation from the Interstate TRS Fund, and to receive compensation from the Interstate TRS Fund, shall submit documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "VRS and IP Relay Certification Application." The documentation shall include, in narrative form:

(i) A description of the forms of TRS to be provided (*i.e.*, VRS and/or IP Relay);

(ii) A description of how the provider will meet all non-waived mandatory minimum standards applicable to each form of TRS offered;

(iii) A description of the provider's procedures for ensuring compliance with all applicable TRS rules;

(iv) A description of the provider's complaint procedures;

(v) A narrative describing any areas in which the provider's service will differ from the applicable mandatory minimum standards;

(vi) A narrative establishing that services that differ from the mandatory minimum standards do not violate applicable mandatory minimum standards;

(vii) Demonstration of status as a common carrier; and

(viii) A statement that the provider will file annual compliance reports demonstrating continued compliance with these rules.

(b) (1) *Requirements for state certification.* After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:

(i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604;

(ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and

(iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

(2) Requirements for VRS and IP Relay Provider FCC Certification. After review of certification documentation, the Commission shall certify, by Public Notice, that the VRS or IP Relay provider is eligible for compensation from the Interstate TRS Fund if the Commission determines that the certification documentation:

(i) Establishes that the provision of VRS and/or IP Relay will meet or exceed all non-waived operational, technical, and functional minimum standards contained in §64.604;

(ii) Establishes that the VRS and/or IP Relay provider makes available adequate procedures and remedies for ensuring compliance with the requirements of this section and the mandatory minimum standards contained in §64.604, including that it makes available for TRS users informational materials on complaint procedures sufficient for users to know the proper procedures for filing complaints; and

(iii) Where the TRS service differs from the mandatory minimum standards contained in §64.604, the VRS and/or IP Relay provider establishes that its service does not violate applicable mandatory minimum standards.

(c)(1) *State certification period.* State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.

(2) *VRS and IP Relay Provider FCC certification period.* Certification granted under this section shall remain in effect for five years. A VRS or IP Relay provider may apply for renewal of its certification by filing documentation with the Commission, at least 90 days prior to expiration of certification, containing the information described in paragraph (a)(2) of this section.

(d) *Method of funding.* Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

(e)(1) *Suspension or revocation of state certification.* The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The Commission may, on its own motion, require a certified state program to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a state program may not be in compliance with the minimum standards.

(2) *Suspension or revocation of VRS and IP Relay Provider FCC certification.* The Commission may suspend or revoke the certification of a VRS or IP Relay provider if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. The Commission may, on its own motion, require a certified VRS or IP Relay provider to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a certified VRS or IP Relay provider may not be in compliance with the minimum standards.

(f) *Notification of substantive change.* (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the

state TRS program continues to meet federal minimum standards after implementing the substantive change.

(2) VRS and IP Relay providers certified under this section must notify the Commission of substantive changes in their TRS programs, services, and features within 60 days of when such changes occur, and must certify that the interstate TRS provider continues to meet federal minimum standards after implementing the substantive change.

(g) VRS and IP Relay providers certified under this section shall file with the Commission, on an annual basis, a report providing evidence that they are in compliance with §64.604.

[70 FR 76215, Dec. 23, 2005]

Appendix B: CSD & Sprint TRS, STS, and VRS Training Outlines

Sprint and CSD TRS Training Outline

Module	Module Description
Module 1	Orientation ▪ Objectives ▪ Welcome & History ▪ Future of Sprint ▪ What is Relay? ▪ CA Training ▪ Call Flow Chart
Module 2	Phone Image ▪ Objectives ▪ Introduction ▪ Communicating Information ▪ Using Conversational Tone ▪ Managing Dissatisfied Customers
Module 3A	Overview of System and Equipment ▪ Objectives ▪ Logging In ▪ Logging Out ▪ Screen Display ▪ Checking for Understanding ▪ Headsets ▪ Modem ▪ Error Correction ▪ Keyboard ▪ Last Typed Macro Feature ▪ English Macros ▪ Spanish Macros ▪ Telephony Terms
Module 3B	Interactive Terminals ▪ Knowing Your TTY ▪ Closing a Conversation ▪ Typing Background Noises
Module 3C	Overview of System and Equipment (FRS Only) ▪ Malfunctions ▪ Relay Procedures ▪ Confidentiality ▪ Statistics ▪ Handling Obscene Calls ▪ Requesting a Supervisor ▪ Reporting ▪ Macros
Module 4A	Call Processing Procedures ▪ Objectives ▪ Your Role as CA ▪ Call Processing for All States

Module	Module Description
Module 4B	**Destinations of Traffic** ▪ Destinations not Allowed ▪ IntraLata Competition ▪ State Differences
Module 4C	**Answering Machines and Audiotext** ▪ Record Feature ▪ Voice Answering Machine ▪ Voice to TTY Answering Machine ▪ Information Line ▪ Audiotext ▪ Voice Mail ▪ Pagers/Beepers (TTY-Voice) ▪ Pagers/Beepers (Voice - TTY) ▪ Variations ▪ Answering Machine Retrieval
Module 4D	**Voice Originated Calls** ▪ Local Call Description ▪ Toll Free and Paid ▪ Paid over Sprint Network ▪ Paid over Alternate Carrier ▪ Variations
Module 4E	**Long Distance Calling** ▪ FONcard ▪ LEC Card ▪ Optional Cards ▪ Pre-Paid Cards ▪ Collect ▪ Third Party ▪ Immediate Credit
Module 4F	**VCO and HCO** ▪ Voice Carry Over (VCO) ▪ Inbound VCO Branding ▪ Busy Line ▪ No Answer ▪ Two-Line VCO ▪ Hearing Carry Over (HCO) ▪ Non-Branded HCO ▪ Branded HCO

Module	Module Description
Module 4G	Alternate Call Types ▪ VCO to VCO ▪ VCO to TTY ▪ TTY to VCO ▪ HCO to HCO ▪ HCO to TTY ▪ TTY to HCO
Module 4H	Customer Database ▪ Customer Database Feature ▪ Customer Notes Window ▪ UCR Main Menu ▪ Name Submenu ▪ COC Submenu ▪ InterLata COC ▪ IntraLata COC ▪ Billing Method Window ▪ Billing Options ▪ Numbers Submenu ▪ Emergency Numbers ▪ Frequently Dialed Numbers (FD) ▪ Blocked Numbers ▪ Customer Notes
Module 4H	Customer Database ▪ Preferences ▪ Answer Type ▪ Language Type ▪ Outdial Restrictions ▪ Macros ▪ Last Number Redial

Module	Module Description
Module 4I	Variations ▪ Busy Signals ▪ Poor Connection ▪ No Answer ▪ Request for Information ▪ Speech Impaired ▪ Pacing Voice Customer ▪ Profanity towards CA ▪ Request for M or F CA ▪ CA Knows Customer ▪ Suicide ▪ Abuse ▪ Illegal Calls ▪ Sensitive Topics ▪ Redialing ▪ Switchboards ▪ Young Children ▪ Inbound ASCII ▪ Repeating Information ▪ Request for Relay Number ▪ Restricted Calls ▪ ASCII on Outbound Line ▪ Regional 800 ▪ Two Calling From Numbers ▪ LEC Service Office ▪ Double Letters ▪ Call Waiting ▪ Conference Calls ▪ Three-Way Calling ▪ Changing CAs ▪ 800 Number Referral ▪ Hard-of-Hearing Customer ▪ Call Backs for TTYs ▪ Multiple Calls
Module 4I	Variations ▪ Call Modification ▪ Holding ▪ Alternate Language ▪ Typing in Parenthesis ▪ Product Information ▪ Spanish Calls ▪ Voice Customer Hangs Up ▪ Variable Time Stamp ▪ TTY Customer Hangs Up ▪ Conversation being Recorded ▪ Prompting Voice for "GA" ▪ Non-Standard TTY Capability ▪ Internet Characters ▪ TTY does not type "GA" ▪ Cellular Long Distance Calls ▪ Party Line Calls

Module	Module Description
Module 5	**Emergency Call Processing** ▪ Emergency Calls ▪ Non-Emergency Calls ▪ Emergency Incident Form
Module 6A	**Performance and Procedures** ▪ Performance Measurement Plan ▪ Quality Customer Service ▪ Commitment ▪ Personal Effectiveness ▪ Assessment Survey and Replay ▪ Emergency Procedures ▪ Emergency Assistance Form ▪ Checking for Understanding
Module 6B	**Healthy Relay** ▪ Introduction ▪ Analogy ▪ Stretching Exercises ▪ CA Reinforcement ▪ Ergonomic Review ▪ Setting up Workstation ▪ GUAM - Get up and move
Module 6B	**Healthy Relay** ▪ Ergonomic Relief ▪ Slowing the Customer ▪ Overtime Relaxation
Module 7A	**Responding Positively** ▪ Stress Management ▪ Thoughts and Feelings ▪ Relaxing Emotionally ▪ Thinking Powerfully ▪ Exercise ▪ Nutrition ▪ Relaxation/Meditation ▪ Energy Resource Assessment ▪ Suggested Reading ▪ Leader's Notes
Module 7B	**Healthy Detachment** ▪ Interactive Communication ▪ TDD Communication ▪ Potential Stressors ▪ Detaching
Module 8	**Assessing Performance** ▪ Assessment Process ▪ Coaching ▪ Feedback ▪ Pass/Fail Guidelines ▪ Role Plays

Module	Module Description
Module 9	**Supervisor as Trainer and Coach** ▪ Introduction ▪ Objectives ▪ Being a Coach/Trainer ▪ An Adult Learner ▪ Giving Effective Instruction ▪ Feedback
Module 10	**A Healthy Approach to Relay** ▪ Learning Continuum ▪ Adult Education ▪ Dale's Cone of Experience ▪ Elements of Lesson Design ▪ Preparation for Training ▪ Warm Ups ▪ Voice Inflection ▪ Handling Interruptions ▪ Prep for Final ▪ Hearing Thru (TDD - Voice) ▪ Hearing Thru (Voice - TDD) ▪ Voice Thru (TDD - Voice) ▪ Voice Thru (Voice - TDD) ▪ Audiotext ▪ Information Lines ▪ Business Answering Machines ▪ Residential Answering Machines ▪ Beepers ▪ Spanish Answering Machine ▪ TTY Answering Machine

Speech-to-Speech Training Outline

Module 1	**Orientation** ▪ Objectives ▪ Welcome & Introductions ▪ Description ▪ History	What is Speech to Speech Differences from Relay Agent Training
Module 2	**Speech to Speech Customers** ▪ Objectives ▪ Introduction ▪ Phone Image ▪ Characteristics of Speech to Speech Customers ▪ Breaking the Stereotypes	Varying Speech Patterns Voice Synthesizers Types of Calls Transparency & Confidentiality Phrases
Module 3	**Attributes of STS CAs** ▪ Objectives ▪ Patience ▪ Concentration ▪ Listening Skills	Caller Control Sensitivity and Understanding
Module 4A	**Call Processing Procedures** ▪ Objectives ▪ Your Role as CA ▪ Billing ▪ Directory Assistance ▪ Changing CAs	
Module 4B	**Answering Machines and Audiotext** ▪ Answering Machines ▪ SA to SD Answering Machine ▪ Busy/Disconnects ▪ Audiotext Message ▪ Pagers/Beepers	
Module 4C	**Emergency Call Processing** ▪ Emergency Services ▪ EM Numbers ▪ Emergency Incident Form	
Module 4D	**Variations** ▪ Outbound to Relay ▪ Personal Conversations ▪ Operator Calls ▪ Talking on Hold ▪ Keeping the Customer Informed ▪ Differentiating STS and Relay ▪ Outdialing to STS	Using GA Spelling Announcement 900 Calls Request to Hold SD to SD through STS Non STS Calls

Video Relay Service Training Outline and Qualifications

All Sprint VRS interpreters are qualified and will adhere to the Registry of Interpreters for the Deaf (RID) Code of Ethics. The VRS interpreter qualifications are listed below:

- Certified by the NAD at levels III, IV, or V or certified by RID as IC/TC, CI, CSC, LSC or MSC or demonstrated State equivalent. (Note: In rare instances, VIs may process Sprint VRS calls prior to certification based on qualifications and interpreting skills).
- Possess English language skills at a college level.
- Observe strict confidentiality guidelines using RID's Code of Ethics.
- Function in a totally transparent mode.
- Possess strong receptive and voicing skills.
- Possess sensitivity to the needs of the Deaf, Hard of Hearing and hearing parties
- Have a wide range of experience working in the deaf Community utilizing ASL, PSE and Signed English Community utilizing ASL, PSE and Signed English communication modes in social, economic, and educational settings.
- Possess interpreting experience for persons who have minimal language skills.
- Possess computer literacy, including familiarity with current Windows operation system, and be able to operate computer and video equipment.
- Exhibit superior customer service skills.
- Posses the skill to conduct video interpretation sessions with a wide range of individuals.
- Have a good command of English grammar and composition.
- Possess clear and articulate voice communications.
- Be familiar with speech and disability cultures, languages, and etiquette.
- Possess the ability to work under pressure.
- Be capable of working in a multi-tasked environment.
- Have the skill to conduct telephone conversations with a wide range of individuals.
- Be a citizen of the U.S. or an alien who has been lawfully admitted for permanent residence as evidenced by the INS Permanent Resident Card (INS Form I-551).
- Successfully completed, as a minimum, training to include deaf culture, American Sign Language, sensitivity to the capabilities and needs of people with speech impairments, the VI's role in the relay process, and training in interpersonal skills to handle difficult or stressful conversations.
- Beginning college level skills in English grammar and diction.

Appendix C: TRS Pledge of Confidentiality

RELAY CENTER CODE OF ETHICAL BEHAVIOR

AS PART OF THE RELAY SERVICES ORGANIZATION, ALL EMPLOYEES, CONTRACTORS AND VISITORS ARE BOUND TO THE LAWS OF THE STATE AND THE FOLLOWING GUIDELINES:

1. ALL TELECOMMUNICATIONS RELAY SERVICE CALL RELATED INFORMATION IS TO BE STRICTLY CONFIDENTIAL. The employee, contractor or visitor shall not reveal any information acquired during or observing a relay call. Any call-related questions or problems are to be discussed with management.
2. NOTHING IS TO BE EDITED OR OMITTED FROM THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. The employee shall transmit exactly what is said in the way that it is intended in the language of the customer's choice.
3. NOTHING IS TO BE ADDED OR INTERJECTED INTO THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. The employee shall not advise, counsel, or interject personal opinions, even when asked to do so by the consumer.
4. TO ASSURE MAXIMUM USER CONTROL, THE EMPLOYEE WILL BE FLEXIBLE IN ADAPTING TO THE CONSUMER'S NEEDS.
5. EMPLOYEES WILL STRIVE TO FURTHER COMPETENCY IN SKILLS AND KNOWLEDGE THROUGH CONTINUED TRAINING, WORKSHOPS, AND READING OF CURRENT LITERATURE IN THE FIELD.

I have read and understand the Relay Center Code of Ethical Behavior. I agree to comply with this Code and any applicable State and Federal laws pertaining to Telecommunications Relay Services and understand that failure to do so will lead to company disciplinary action that may result in my termination and criminal prosecution.

_____

EMPLOYEE/CONTRACTOR/VISITOR SIGNATURE DATE

_____ _____

MANAGER/SUPERVISOR SIGNATURE DATE

Appendix D: E 911 Call Procedure

CSD uses a system for incoming emergency calls that automatically and immediately transfers the relay user to the nearest Public Safety Answering Point (PSAP). CSD considers an emergency call to be one in which the user of the relay service indicates they need the police, fire department, paramedics, or ambulance. The following steps will be taken to connect the caller to the correct PSAP:

- The CA, when told by a TTY/ASCII user (non-voice) that an emergency exists, will hit a “hot key”.

- The CA’s terminal sends a query to the E911 database containing the caller's geographic area ANI.

- The database responds with the telephone number of the PSAP that covers the geographic source of the call, and then, automatically dials the PSAP number, and automatically passes the caller’s ANI to the E911 service center.

The CA remains on the line until emergency personnel arrive on the scene unless previously released by the caller. The CA also verbally passes the caller’s ANI onto the E911 center operator. If the inbound relay caller disconnects prior to reaching E911, the CA will stay on the line to verbally provide the caller’s ANI to the E911 center operator.

Appendix E Sprint Carrier of Choice Letter of Invitation

(date)

(name)
(Company name)
(address)
(telephone)
(fax)
(e-mail address)

Re: (Customer's name and phone number – requested LEC for COC)

Thank you for your interest to complete (Company Name) Long Distance calls with Sprint Telecommunications Relay Service (TRS). As the default Toll carrier for processing relay calls in more than thirty-two states (32), Sprint currently transports the traffic of customers who have selected you as their Toll carrier. However, many of your customers would prefer to use (Company Name) LD for their toll calls. At present, Sprint TRS is unable to send the toll calls from the regional centers or state access tandem to your network. Hence, this letter is being written to make you aware of a potential service-impacting issue regarding TRS calls and measures your company can take to ensure your customers' toll calls are completed through TRS.

The Americans with Disabilities Act of 1990 mandate TRS, and TRS standards are established and are monitored by the Federal Communications Commission (FCC). TRS is a service that links telephone conversations between standard (voice) telephone users and people who are deaf, hard of hearing, deaf-blind, or speech disabled using Text Telephone (TTY) equipment. The State Public Utilities Commission manages the day-to-day operations of TRS and has contracted with Sprint Corporation to provide relay service in their states.

Both, the Americans with Disabilities Act of 1990 and FCC's Order 00-56 on TRS mandate that all states provide TRS and that TRS users shall have equal access to their chosen interexchange carrier and to all other operator services, to the same extent that such access is provided to voice users. In order to provide this access to your customers, your company is encouraged to submit a letter of authorization to accept TRS calls from Sprint.

Attachment A lists the facility-based providers who currently participate at Sprint TRS Carrier of Choice program. If your company (or your facility based provider) is

not currently listed, please review the following and determine the appropriate follow-up action needed to be taken:

Facility-based provider

1. If you *are a participating member* at Sprint Carrier of Choice program, please disregard.
2. If you *are not a participating member* at Sprint Carrier of Choice program, you need to establish a network presence at the regional centers or state access tandem and accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below).

Non-facility based provider

1. If your underlying toll carrier *is a participating member* at Sprint Carrier of Choice program, Sprint can implement the IXC brand name and pass the toll call information to the underlying carrier's CIC code. Please submit a letter of authorization that would advise Sprint to implement the carrier brand name and to send the toll call information to its underlying toll carrier.
2. If your underlying toll carrier *is not a participating member* at Sprint Carrier of Choice program, you will need to work with your underlying toll carrier to establish a network presence at the regional centers or state access tandem and accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below).

Before you submit a letter of authorization to Sprint TRS, please consider the following four factors:

3. Your CIC codes or your underlying toll carrier CIC codes associated with 1+, 0+, and 0- and International dialing must be loaded into the regional (and/or state) access tandems.
4. You or your underlying toll carrier will need to support SS7 tandem interconnection.
5. You or your underlying toll carrier will need to ensure that your translation tables are updated in order to appropriately receive, rate, and bill Sprint calls per Bellcore industry standards. Sprint calls are designated as ANI II Digit Pair ***60, 66, and 67***.
6. If you utilize more than one underlying toll carrier to carry the toll traffic, select a single toll carrier that will accept Sprint traffic.

   Note*: For detailed information regarding access tandem interconnection and carrier of choice provisioning through Sprint, please refer to ATIS/NIIF-008, the "Telecommunications Relay service – Technical Needs" document.*

Attachment B lists Access Tandem Interconnection locations which Sprint TRS is connected with. The best way to provide access to your Toll network through relay service for your customers is to designate the 13 Sprint Regional TRS center/Access

Tandem combinations as the points at which Sprint will hand off Toll relay service traffic to you. In this manner, any relay caller that wishes to use your services may be efficiently, and with minimal time delay, routed to your network. Should you not have a presence at one or more of the Sprint regional center/access tandem combinations, the traffic may be handed off at one of the regional center's access tandem.

Attachment C is a sample letter of authorization. Once Sprint receives your written request to participate in the Sprint TRS Carrier of Choice program, Sprint will schedule translation updates in the next available release (usually 45 to 90 days). **Information obtained from the carriers will be used solely for the purpose of providing equal access for** (Company Name) **LD customers and shall be held proprietary.**

Sprint welcomes your company's participation in our TRS Carrier of Choice program at **no cost** to you if your company has network presence at any of our listed regional center/state access tandem locations. Your participation at the Sprint Carrier of Choice program will create a win-win situation for our customers. Through Sprint, as the relay provider, customers will be able to enjoy uninterrupted service and your company will be able to generate additional revenue.

Thank you for your prompt attention to this matter. If you have any questions concerning with the letter, please do not hesitate to call (Account Manager) at (phone number) or email at (e-mail address).

Sincerely Yours,

(your name)

CC: Michael Fingerhut, Federal Regulatory, Sprint
Angela Officer, Program Manager, Sprint

Attachment A

Current participating members (facility-based providers) at Sprint TRS Carrier of Choice:

Entity	CIC Code
AT&T Communications	0288
Bell South Long Distance	0377
Bestline	0302
Birch Telecom	0678
Broadwing Communications	0948
Broadwing Telecommunications	0071
Cox Communications	6269
Excel Telecommunications, Inc.	0752
Global Crossings Telecommunications	0444
MCIWorldCom	0222
McLeod USA	0725
Qwest Communications	0432
SBC Communications Long Distance	5792
Souris River Telecommunications	0770
Sprint	0333
Telecomm*USA (MCIWorldCom)	0220, 0321, 0835, 0987
Touch America Services, Inc.	0244
U.S. Link	0355
VarTec dba Clear Choice Communications	0636
VarTec Telecom, Inc.	0465, 0638, 0811, 0899, 5111
Verizon Long Distance	5483
Winstar	0643
Working Assets	0649
WorldCom	0555, 0987
WorldXChange	0502, 0834

Updated: 8/12/07

Attachment B

Access Tandem Interconnection Locations

State	Access Tandem	Tandem CLLI	Tandem LEC
Missouri	Kansas City	KSCYMO5503T	SBC
Texas	Ft Worth	FTWOTXED03T	SBC
North Carolina	Charlotte	CHRLNCCA05T	Bell South
South Carolina	Charleston	CHTNSCDT60T	Bell South
New York	Syracuse	SYRCNYSU50T	Verizon
Ohio	Dayton	DYTNOH225GT	Ameritech
South Dakota	Sioux Falls	SXFLSDCO09T	Qwest
North Dakota	Bismarck	BSMRNDBC12T	Qwest
Arkansas	Little Rock	LTRKARFR02T	Southwestern E
Florida	Miami	NDADFLGG01T	Bell South
California	Sacramento	SCRMCA0103T	Verizon / Pac B
Colorado	Denver	DNVRCOMA02T	Qwest
Illinois	Chicago	CHCGILNE50T	Ameritech
Minnesota	Owatonna	OWTNMNOW12T	Qwest
Wyoming	Cheyenne	CHYNWYMA03T	Qwest

Updated: 8/12/07

Attachment C

S A M P L E Letter of Authorization

< DATE >

<Name>, Account Manager
<Street1> <Street2>
<City>, <State> <Zip Code>
FAX: <Fax. No.>

This letter of authorization has been issued to give Sprint TRS permission to send < Toll Carrier Company Name > toll traffic associated with 1+, 0+, and 0- and International dialing through Sprint TRS at the < Regional COC Tandems >.

1. **Regional COC Tandems**

   You will need to provide Sprint with the following:

   Toll Carrier: < insert name>

   CIC Code: <insert CIC)

   Underlying Toll Carrier: <insert name>
   Underlying Carrier CIC Code: <insert CIC>

Choose Tandem Below

State	Access Tandem	Tandem CLLI	Tandem LEC
Missouri	Kansas City	KSCYMO5503T	SBC
Texas	Ft Worth	FTWOTXED03T	SBC
North Carolina	Charlotte	CHRLNCCA05T	Bell South
South Carolina	Charleston	CHTNSCDT60T	Bell South
New York	Syracuse	SYRCNYSU50T	Verizon
Ohio	Dayton	DYTNOH225GT	Ameritech
South Dakota	Sioux Falls	SXFLSDCO09T	Qwest
North Dakota	Bismarck	BSMRNDBC12T	Qwest
Arkansas	Little Rock	LTRKARFR02T	Southwestern E
Florida	Miami	NDADFLGG01T	Bell South
California	Sacramento	SCRMCA0103T	Verizon / Pac B
Colorado	Denver	DNVRCOMA02T	Qwest
Illinois	Chicago	CHCGILNE50T	Ameritech
Minnesota	Owatonna	OWTNMNOW12T	Qwest
Wyoming	Cheyenne	CHYNWYMA03T	Qwest

Updated 8/12/07

2. Call Type Restrictions

< Toll Carrier Brand Name > will accept any intrastate, international and operator services call types that will be routed to the < tandem location(s) > tandems.

OR

< Toll Carrier Brand Name > will accept any (*specify intrastate, interstate, international, and operator services*) call types except for (*specify what call types and restrictions*) that should not be routed to the < tandem location > tandems.

If there are any questions regarding this letter of authorization, please contact < Name >, < Job Title >, < Department Name > at xxx-xxx-xxxx.

Sincerely, < Name >< Job Title >, < Department Name >

Appendix F: Sprint Route Outage Prevention Programs

Call Before You Dig Program

This program uses a nationwide 800 number interlinked with all local/state government utility agencies as well as contractors, rail carriers, and major utilities. Sprint currently receives in excess of 60,000 calls per month for location assistance over the 23,000-mile fiber network.

Awareness Program

This Sprint program proactively contacts local contractors, builders, property owners, county/city administrators, and utility companies to educate them on Sprint's cable locations and how each can help eliminate cable outages.

Route Surveillance Program

This is a Network Operations department program using Sprint employees to drive specific routes (usually 120 miles) and visually inspect the fiber cable routes. This activity is performed an average of 11.6 times per month or approximately once every 2-3 days.

Technician Program

Technicians are stationed at strategic locations and cover an area averaging 60 route miles. Each technician has emergency restoration material to repair fiber cuts on a temporary basis. Other operations forces within a nominal time frame accomplish total repair.

Fiber/Switch Trending Program

This includes a weekly summary of equipment failure events highlighting bit error rate (BER) and cable attenuation. As a result, Sprint identifies potential equipment problems and monitors performance degradation to establish equipment-aging profiles for scheduled repair, replacement, or elimination. Aging profiles are computer-stored representations of the characteristics of a fiber splice. The profile is stored at the time the splice is accepted and put into service. A comparison of the original profile and current profile are compared for performance degradation. Maintenance is scheduled based on this type of monitoring.

Network Management and Control Systems

The Sprint network is managed and controlled by a National Operations Control Center (NOCC) located in Overland Park, KS. As a back up, a secondary NOCC is located in Lenexa, KS. The NOCC is designed to provide a national view of the status of the network as well as to provide network management from a centralized point. The NOCC interfaces with the Regional Control Centers (RCCs) to obtain geographical network status. The RCCs are responsible for maintenance dispatch and trouble resolution, and are designed to provide redundancy for each other and back-up status for the NOCC.

The NOCC and RCC work closely with the ESOCC in cases where a network problem may affect South Dakota operations. In cases such as these, the NOCC or RCC immediately alerts the ESOCC of the situation so that appropriate steps can be taken to minimize service impacts. The NOCC and RCCs also serve as reference points for the ESOCC when problems are detected in the TRS center that are not the result of internal center operations.

Network Management

Commitment to a digital fiber optic network permits Sprint to use a single transmission surveillance protocol to integrate internal network vendor equipment. This enhances Sprint's ability to automate and provide preventive, near real-time detection and isolation of network problems. The controlling principle is identification and correction of potential problems before they affect the South Dakota call capabilities.

Sprint divides the major functional responsibilities, facilities maintenance and network management, into a two-level organization which maximizes network efficiencies and customer responsiveness. The first level consists of the RCCs located in Atlanta and Sacramento. RCC personnel focus on the performance of individual network elements within predetermined geographical boundaries. The second level is the NOCC in Kansas City that oversees traffic design and routing for Sprint's 23,000-mile fiber optic network and interfaces.

This two-level operational control organization, combined with architectural redundancies in data transport and surveillance, control and test systems, ensures an expedited response to potential problems in both switched and private line networks.

In the event of a power outage, the UPS and backup power generator ensure seamless power transition until normal power is restored. While this transition is in progress, power to all of the basic equipment and facilities essential to the center's operation is maintained. This includes:

- Switch system and peripherals
- Switch room environmentals
- CA positions (consoles/terminals and emergency lights)
- Emergency lights (self-contained batteries)
- System alarms
- CDR recording

As a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the back-up generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental control until commercial power is restored.

Appendix G: Disaster Recovery Plan

Sprint's comprehensive Disaster Recovery Plan developed for South Dakota details the methods Sprint will utilize to cope with specific disasters. The plan includes quick and reliable switching of calls, network diagrams identifying where traffic will be rerouted if vulnerable circuits become inoperable, and problem reporting with escalation protocol. Besides service outages, the South Dakota Disaster Recovery Plan applies to specific disasters that affect any technical area of Sprint's Relay network.

The first line of defense against degradation of South Dakota is the Intelligent Call Router (ICR) technology that Sprint employs. During a major or minor service disruption, the ICR feature bypasses the failed or degraded facility and immediately directs calls to the first available agent in any of Sprint's eleven fully inter-linked TRS Call Centers. State-specific call processing software resides at each of Sprint's Relay Call Centers. Communications Assistants (CAs) are trained in advance to provide service to other States; the transfer of calls between centers is transparent to users.

Beyond the ICR, Sprint's Disaster Recovery Plan details the steps that will be taken to deal with any problem, and restore South Dakota to its full operating level in the shortest possible time.

South Dakota Notification Procedure

To provide South Dakota with the most complete and timely information on problems affecting their TRS, the trouble reporting procedure for South Dakota will include three levels of response:

- A 3-hour verbal report
- A 24-hour status report
- A comprehensive final report within 5 business days

CSD will notify South Dakota within three hours if a service disruption of 30 minutes or longer occurs. For service disruptions occurring outside normal business hours, the initial report will be provided by 8:30 AM on the next business day. This initial report will explain how the problem will be corrected and an approximate time when full service will be restored. Within 24 hours of the service disruption, an intermediate report provides problem status and more detail of what action is necessary. In most cases, the 24-hour report reveals that the problem has been corrected and that full service to South Dakota has been restored. The final comprehensive written report, explaining how and when the problem occurred, corrective action taken, and time and date when full operation resumed will be provided to the South Dakota Administrator within five business days of return to normal operation. Examples of service disruption to South Dakota include:

- ACD failure or malfunction
- Major transmission facility blockage

- Threat to South Dakota CA's safety or other CA work stoppage
- Loss of CA position capabilities

Performance at each Sprint relay center is monitored continuously 24 hours a day, seven days a week from Sprint's Enhanced Services Operation Control Center (ESOCC) in Overland Park, KS.

Disaster Recovery Procedures

If the problem is within the relay center serving South Dakota, maintenance can usually be performed by the on-site technician, with assistance from Sprint's ESOCC. If the problem occurs during non-business hours and requires on-site assistance, the ESOCC will page the technician to provide service remedies. Sprint retains hardware spares at each center to allow for any type of repair required without ordering additional equipment (except for complete loss of a center).

Time Frames for Service Restoration

Complete or Partial Loss of Service Due to Sprint Equipment or Facilities

- Sprint Call Center Equipment - A technician is on-site during the normal business day. The technician provides parts and / or resources necessary to expedite repair within two hours. Outside of the normal business day a technician will be on-site within four hours. The technician then provides parts and /or resources necessary to expedite repair within two hours.
- Sprint or Telco Network Facilities - For an outage of facilities directly serving South Dakota, incoming TRS calls will immediately be routed to one of ten other centers throughout the US. No calls will be lost. Repair of fiber or network facilities typically requires less than eight hours.
- Due to Utilities or Disaster at the Center - Immediate rerouting of traffic occurs with any large-scale center disaster or utility failure. Service is restored as soon as the utility is restored, provided the Sprint equipment has not been damaged. If the equipment has been damaged the service restoration for Sprint equipment (above) applies.
- Due to Telco Facilities Equipment - A Telco equipment failure will not normally have a large effect on TRS traffic within the state unless it occurs on Telco facilities directly connected to the call center. In this case, normal Sprint traffic rerouting will apply. For a failure at a telco central office - In (CITY), for example, only local (CITY) residents would be affected until the Telco has performed the necessary repairs. For situations like this, it will be at Sprint's discretion to dispatch a technician. The normal Telco escalation procedures will apply. The Telco escalation process is all during the normal business day; therefore, a trouble may be extended from one day to the next.

Trouble Reporting Procedures

The following information is required when a South Dakota user is reporting trouble:

- Service Description (“South Dakota”)
- Caller’s Name
- Contact Number
- Calling to/Calling from (if applicable)
- Description of the trouble

Service disruptions or anomalies that are identified by South Dakota users may be reported to the Sprint Relay Customer Service 800 number (800-877-0996) at any time day or night, seven days a week. The Customer Service agent creates a trouble ticket and passes the information on to the appropriate member of Sprint’s Maintenance Team for action. Outside the normal business day, the ESOCC will handle calls from the Customer Service agents 24 hours a day, 7 days a week. The Maintenance Team recognizes most disruptions in service prior to customers being aware of any problem. Site technicians are on call at each of Sprint’s11 TRS Call Centers to respond quickly to any event, including natural disasters.

Mean Time to Repair (MTTR)

MTTR is defined and detailed in Tables A-1 and A-2:

Table A-1 Time to Investigate + Time to Repair + Time to Notify

Time to Investigate	The time needed to determine the existence of a problem and its scope.
Time to Repair	Repair time by Field Operations plus LEC time, if applicable.
Time to Notify	From the time repair is completed to the time the customer is notified of repair completion.

Table A-2 Current MTTR Objectives

Switched Services	8 Hours
Private Lines	4 Hours (electronic failure)
Fiber Cut	8 Hours

Sprint’s Mean Time to Repair is viewed from the customer’s perspective. A critical element in the equation is the Time to Notify, because Sprint does not consider a repair complete until the customer accepts the circuit back as satisfactory.

Escalation Procedures

If adequate results have not been achieved within two hours, a South Dakota user may escalate the report to the next level. Table A-3 details the escalation levels.

Table A-3 Escalation Levels

Escalation Level	Contact	Phone

2	Regional Maintenance Manager	Office Phone Number (913) 253-4394 Cell Phone Number Cell Phone 913-484-2263
3	Senior Manager, Technical Staff	Office Phone Number (913) 253-4396

Service Reliability

Sprint's service is provided through an all-fiber sophisticated management control networks support backbone networks with digital switching architecture. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the Sprint network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes.

A 100 percent fiber-optic network, with significant fiber miles in South Dakota, provides critical advantages over the other carriers. These advantages include:

- Quality

  Since voice or data are transmitted utilizing fiber optic technology, the problems of outdated analog and even modern microwave transmission simply do not apply. Noise, electrical interference, weather-impacting conditions, and fading are virtually eliminated.

- Economy

  The overall quality, architecture, and advanced technology of digital fiber optics makes transmission so dependable that it costs us less to maintain, thereby passing the savings onto our customers.

- Expandability

  As demand for network capacity grows, the capacity of the existing single-mode fiber can grow. Due to the architecture and design of fiber optics, the capacity of the network can be upgraded to increase 2,000-fold.

- Survivability

  Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads. Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to South Dakota, and a competitive differentiation of the Sprint network.

Currently, Sprint has over 23,000 miles of its fiber network in place and in service, with a fiber point of presence (POP) in every Local Access Transport Area (LATA). The 1 LATAs in South Dakota are served by 3 Sprint POPs. There are plans for additional fiber mileage, additional POPs, and added route diversity. There are more than 300 POPs in service on the network. With 3 POPs in the state, all areas will be adequately serviced by Sprint.

Switched services are provided via 49 Northern Telecom DMS-250/300 switches at 29 locations nationwide. Three DMS-300s located at New York, NY; Fort Worth, TX; and Stockton, CA, serve as international gateways. The remaining 46 switches provide switching functions for Sprint's domestic switched services. South Dakota would primarily be served by the DMS switches in Pierre, Rapid City, and Sioux Falls, South Dakota, with other diversely located facilities also serving South Dakota.

Interconnection of the 49 switches is provided in a non-hierarchical manner. This means that inter-machine trunk (IMT) groups connect each switch with all other switches within the network. Each of these IMT groups is split and routed through the Sprint fiber network over SONET route paths for protection and survivability. As an extra precaution to preclude any call blockage, Dynamically Controlled Routing (DCR) provides an additional layer of tandem routing options when a direct IMT is temporarily busy.

Reliability is ensured through a corporate commitment to maintain or surpass our system objectives. Beginning with the network design, reliability and efficiency are built into the system. Sprint continues to improve the network's reliability through the addition of new technologies such as Digital Cross-connect Systems, SONET, and Signaling System 7.

The effectiveness of this highly reliable and survivable network is attributed to the redundant transmission and switching hardware configurations, SONET ring topology, and sophisticated network management and control centers. These factors combine to assure outstanding network performance and reliability for South Dakota.

Network Criteria

System Capacity

The Sprint network was built with the capacity to support every interLATA and intraLATA call available in the US. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

Appendix H: Sprint TRS Standard Features Matrix

Mandatory Features	Description/Benefits	Cost
Answering Machine Retrieval	This feature allows Relay callers to retrieve their answering machine or voice-mail messages through the CA (Relay Agent, Relay Operator, Communication Assistant), referred to in this document as "CA".	No Additional Cost
ASCII Split Screen	The feature enables an ASCII user to communicate with the Relay in full duplex mode. Similar to voice-to-voice conversation, it provides interrupt capability as appropriate for the ASCII user and the voice party.	No Additional Cost
Automated Number Identification (ANI) Technology	ANI is the telephone number of the line initiating a call. The number is identified by the switch and passed over the network to the CA workstation.	No Additional Cost
CA Typing Speed	Text transmission of 60 wpm.	No Additional Cost
CA 10-minute In-call replacement	CAs are required to stay with a TRS call for a minimum of 10 minutes and with a STS call for minimum of 15 minutes.	No Additional Cost
Caller ID	Caller ID featuring SS7 technology is used to deliver the ten digit phone number of the calling party, when not blocked through the LEC for local and toll calls.	No Additional Cost
Call Response Time	Call response time is measured from the time it takes the call to hit the CA position from the Relay Center call controller switch. Sprint will adhere to the State's requirements regarding answer time.	No Additional Cost
Background Noises	During the call, TTY callers will be informed of background noises through CA's tying in parenthesis.	No Additional Cost
Beepers and Pagers	Sprint provides functionally equivalent pager calls, which are made to beepers and pagers, interactively and non-interactively. Calls are relayed between interactive paging services and the Relay users. For non-interactive paging services, calls are made to leave specific numeric information to accomplish those calls.	No Additional Cost
Branding of Call Type - Temporary	This feature refers to the system's ability to answer an incoming call based on the previous call in the caller's communication mode (TTY, Voice, ASCII, VCO, HCO, Spanish, Turbo Code, Deaf-Blind).	No Additional Cost
Branding of Call Type – Permanent	This feature refers to the system's ability to brand the caller's preferred communication mode – TTY, Voice, ASCII, VCO, HCO, Spanish, Turbo Code, Deaf-Blind – permanently.	No Additional Cost
Carrier-of-Choice	This feature allows Relay callers to choose their preferred Carrier for interstate/international and in some cases intra-island calls.	No Additional Cost
Cellular/PCS Phone Access	Allows Relay Cellular customers to reach the Relay 800 number(s) to complete Relay calls.	No Additional Cost
Custom Calling Services	Through the Customer Database feature, this feature allows Relay callers to have traditional LEC services i.e. frequently called numbers.	No Additional Cost
Customer Database	Allows Relay callers to enter specific information in a profile i.e. Carrier-of-Choice, emergency numbers, last number redial, customer notes, frequently dialed numbers, etc. to expedite their call set-up time.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Name and Address	This information could save valuable time when calling emergency services.	No Additional Cost
Long Distance profile	Callers' preferred Carrier for in-State and out-of-state long distance calls. Callers can also indicate their preferred billing option when placing long distance calls.	No Additional Cost
Frequently Dialed Numbers	This feature allows users to set up and access "speed dial" calls through the Relay.	No Additional Cost
Outdial Information	This feature allows the CA to be aware as to how the caller answers the phone and which language type they will communicate in.	No Additional Cost
Customer Notes	This feature informs the CA of special requests to handle calls i.e. "do not announce the service", preferred CA gender, etc.	No Additional Cost
Outdial Restrictions	Callers may restrict the type of call i.e. long distance, international, 900, etc. to be placed through the Relay.	No Additional Cost
Emergency Numbers	Callers may enter emergency numbers such as fire, doctor, police, etc. to expedite the emergency call processing.	No Additional Cost
Customized 800 Access	Each State has dedicated Relay 800 numbers to access the Relay service.	No Additional Cost
Deaf-Blind Pacing (Slow-typing)	This feature provides functionality that automatically slows the transmission of data to Deaf-Blind users. The default speed is 15 wpm and the speed can be increased at the caller's request in 5-wpm increments.	No Additional Cost
Delayed Call Announcer	Sprint sends a delayed call announcer when the call is not answered within 30 seconds. The feature alerts Relay callers that they are on-line and on hold for next available CA.	No Additional Cost
Dialed Number Verification	This feature echoes the number being outdialed and the call type in the TTY Dial string macro. This feature helps TTY callers know if a number has been misdialed and the type of call they are placing.	No Additional Cost
Directory Assistance (Intrastate/Interstate)	This feature allows Relay callers to reach Directory Assistance at rates no greater than that of traditional voice users. When the number is obtained, the caller may choose to place the call through the Relay or dial direct.	No Additional Cost
Emergency Assistance	This service provides emergency assistance for Relay callers through Sprint's E911 database and/or their Customer Database profile.	No Additional Cost
Enhanced Modems	Sprint's TRS modems support enhancements in ASCII communication protocols. The capabilities of Sprint's modems include auto detection; connections with modems up to 14.4k; and faster ASCII detection (3 seconds).	No Additional Cost
Error Correction	Sprint Relay workstations are equipped with the Error Correction capability to automatically correct common typographical errors and spell out abbreviations, while increasing typing speed and reducing conversational minutes.	No Additional Cost
Gender ID	This feature provides the gender of CAs in the TTY greeting macro.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Hearing-Carry-Over (HCO)	HCO allows speech-disabled or mute users with normal hearing to listen to the person they are calling. The HCO user types his/her conversation for the CA to read and voice to the standard (voice) telephone user.	No Additional Cost
HCO-HCO	HCO users can contact HCO users through the Relay. The CA will voice to both parties what is typed on each user's TTY.	No Additional Cost
HCO Permanent Branding	The permanent branding enables HCO callers to listen during call set-up. The HCO brand greeting macro is: [STATE] RELAY 1234F YOU MAY HEAR VOICE OR USE TTY GA	No Additional Cost
HCO-TTY	HCO users can contact TTY users through the Relay. HCO users can listen while the CA is reading/voicing the TTY user's typed message. The HCO user types their conversation directly to the TTY user.	No Additional Cost
Voice-Carry-Over (VCO)	VCO allows Deaf or Hard-of-Hearing people who prefer to use their own voice to speak directly to the party they are calling. The CA types the voiced responses back to the VCO user who can read the typed messages across the TTY screen.	No Additional Cost
Two-line VCO	This feature allows VCO callers with two telephone lines to use one line to speak directly to the hearing person while the other line is used to receive the CA's typed responses simultaneously. Two-Line VCO offers a more natural flow of conversation without pauses required with single line calls.	No Additional Cost
Reverse 2-Line VCO	This feature is similar to Two-line VCO. In R2LVCO, a VCO user receives a call from a voice user first then dials/connects the Relay CA.	No Additional Cost
VCO-HCO	VCO users can contact HCO users through the Relay. The VCO user speaks directly to the HCO user and the HCO user types their conversation directly to the VCO user.	No Additional Cost
VCO-VCO	VCO users can contact other VCO users through the Relay. The CA listens to VCO users speak and type the spoken words for the parties at both ends.	No Additional Cost
VCO-TTY	VCO users can contact TTY users through the Relay. The VCO user can use his/her own voice and the CA will listen to the VCO caller's spoken words then type the message to the TTY user. The TTY user types directly to VCO user without any CA interaction.	No Additional Cost
VCO w/ Privacy/NO GA	This is similar to the standard VCO feature however; the CA will not hear the VCO caller speaking through the Relay. The CA will only type voiced responses back to the VCO user.	No Additional Cost
VCO Permanent Branding	This feature enables VCO callers to set-up the call without typing. The permanent VCO brand greeting macro would be: [STATE] RELAY 1234F VOICE (OR TYPE) NOW GA	No Additional Cost
Inbound International	From any international destinations outside of United States, callers can reach the Relay through Sprint's international inbound 10-digit number- 605-224-1837.	No Additional Cost
Intelligent Call Router	Dynamic Call Routing technology automatically and seamlessly routes Relay calls to the first available English or Spanish CA in the network.	No Additional Cost
Intercept Message	This feature provides intercept messages in voice and TTY in event of system failure occurrence within the Relay switch, Center, or outbound circuits.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Last Number Redial	Relay users can request the CA to redial their last number. Sprint TRS is designed to store the user's last number dialed and it is dialed upon the user's command, "LAST NUMBER REDIAL PLS GA" OR "LNR GA".	No Additional Cost
Local/Extended Area Service	Callers who subscribe to extended area service plans will receive equivalent service through the Relay.	No Additional Cost
Machine Recording Capabilities	This feature reduces redials when CAs receive audio-text interaction machines. In most cases, it allows the callers to receive all of the information on the first call and eliminates the number of redials.	No Additional Cost
Restricted 800/888/877/866/855	This feature allows Relay callers to reach regionally restricted or regionally directed 800/888/877/866/855 toll-free numbers.	No Additional Cost
Spanish-to-Spanish	Sprint offers Spanish Services, which offers Spanish-to-Spanish Relay service, which are handled by proficient bilingual (Spanish) CAs. Their workstations are modified to provide macros and other functions to the caller in Spanish.	No Additional Cost
Speech Disabled Indicator	The command "S" typed by a Speech-Disabled person would inform the CA that a Speech-Disabled person is on the line.	No Additional Cost
Speech-to-Speech	This service enables Speech-Disabled customers to use their voice, with assistance from CA if necessary, to communicate with each other through the Relay.	No Additional Cost
Text/Voice Transmission	This feature offers the ability to toggle between inbound TTY, ASCII, TurboCode™, and Voice calls.	No Additional Cost
Toll Discounts	When calls are carried over the Sprint network, intrastate calls are typically discounted by 35% Day, 25% Evening, and 10% Night/ Weekend off intrastate MTS rates and interstate calls are discounted by 50% off interstate MTS rate. State specific requirements may result in a change to the standard discounts.	No Additional Cost
Transfer Gate capabilities	Sprint's system has the capability of transferring Relay callers to English TTY Operator Service and Relay 24-hour Customer Service.	No Additional Cost
TRS Customer Service	Relay users can reach Sprint's TRS Customer Service, which is available 24 hours-a-day, 7 days-a-week to request information, or to offer commendations and submit complaints. The toll-free number is: 1-800-676-3777 TTY/Voice/ASCII/Spanish.	No Additional Cost
TTY Operator Services (OSD)	Sprint's TTY Operator services can complete TTY-to-TTY calls; obtain Directory Assistance information; or receive credit for erroneous billing. The toll-free number is: 1-800-855-4000.	No Additional Cost
TurboCode™	This feature allows enhanced baudot transmission speed up to 110 words-per-minute. It enables TTY callers with TurboCode™ capability to interrupt during the transmission of the call.	No Additional Cost
Variable Time Stamp Macro	This feature (macro) enables Relay callers to know when their called party had disconnected and relays the last spoken words.	No Additional Cost
Voice Call progression	This system upgrade allows Voice or HCO callers to listen during call set-up i.e. ringing, busy.	No Additional Cost
Voice Gender ID	This feature (macro) informs the outbound TTY caller the gender of their caller.	No Additional Cost

Mandatory Features	Description/Benefits	Cost
Pay-Per-Call	Sprint provides access to Pay-Per-Call Services (900) via a toll-free 900 number which observes LEC restrictions so that customers do not have to register blocks with the Relay.	No Additional Cost
7-1-1	With cooperation of Local Exchange Companies, the Relay can accept 711 calls.	No Additional Cost

Appendix I: Policy on 10- and 15-Minute Rule

CSD understands that a change of CAs can interrupt the natural call flow. Therefore, CSD strives to keep the same CA dedicated to each call. CSD will ensure that the CA remains on the call for at least 10 minutes (or 15 minutes for Speech-to-Speech call). If a change of CA is unavoidable, CAs are trained to make this transition as smoothly as possible and will inform both parties.

A CA change may occur for the following reasons:

- Customer requests change of CA
- End user verbal abuse of CA or obscenity towards CA
- The call requires a specialist (Speech to Speech, another language)
- Illness
- Potential conflict of interest (i.e. the CA identifies an end user as a family member or friend)

In instances where it is necessary to change CAs, a second CA will plug in their headset at the position and watch the call for several minutes in order to assess the "spirit" of the call and make the transition smoother. After several minutes of observation, the second CA will wait until the voice person stops speaking and all conversation has been relayed and will then type to the TTY user:

(CA# CONTINUING UR CALL).

The CA will say to the non-TTY user:

"THIS IS CA # CONTINUING YOUR CALL."

During initial training, trainees are required to practice this procedure. In addition, a training video was developed that clearly shows the procedure and how to ensure it is as smooth as possible.

Appendix J: FCC TRS Mandatory Minimum Standards & Compliance Matrix

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
Provision of Services		
δ 64.603	Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.	Sprint has been a TRS provider since September 1, 1990. As of July 1, 2004, Sprint provides TRS to 32 States, the Federal Government, Common wealth of Puerto Rico, and three resellers.
	Speech-to-speech relay service shall be provided by March 1, 2001.	Sprint was the first TRS provider to offer Speech-to-speech relay service (California, 1996).
	Interstate Spanish language relay service shall be provided by March 1, 2001.	Sprint was the first TRS provider to offer intrastate and interstate Spanish services (Texas, 1991). As a standard offering of TRS, Sprint provides Spanish services to the States. Sprint also is the only TRS provider to offer Spanish-speaking Customer Service.
	In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.	Sprint fully implemented 711 accesses for all of its States on October 1, 2001. Sprint Local and wireless divisions have implemented 711 access on September 15, 2001.
Operational Standards		
δ 64.604 A.1	Communications Assistant (CA) Competency Skills	
	CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.	Sprint requires that all CAs have a high school graduate equivalency as a minimum qualification for the job.
	CAs must be competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.	All CAs are tested and evaluated to ensure Relay skills meet the following FCC Guidelines. CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures and ASL translation.
	Typing Speed - 60 WPM with	Each Sprint CA is required to take

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
	technological aids	the 60 WPM typing test quarterly (four times a year).
	Oral-to-type tests	Sprint administers Oral-to-type tests.
	VRS 'qualified' Interpreters	Sprint VRS interpreters are qualified interpreters that adhere to RID Code of Ethics.
δ 64.604 A.2	Confidentiality & Conversation Context	
	CAs are prohibited from disclosing the content of any relayed conversation regardless of content	CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.
		Sprint CAs are prohibited from disclosing any call content.
	Certain exceptions are provided for Speech-to-Speech calls.	STS CAs are permitted to retain info from a call in order to facilitate the completion of consecutive subsequent calls.
	CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise	CAs relay calls verbatim and do not alter relayed conversation.
		During the annual merit reviews, each CA reviews the confidentiality and code of ethics with his/her team supervisor.
δ 64.604 A.3	Types of Calls	
	CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.	CAs process all calls and never prohibit sequential calls or limit length of calls.
	TRS shall be capable of handling any type of call normally provided by common carriers.	Sprint TRS is capable of handling all call types normally provided by common carriers
δ 64.604 A.4	Handling of Emergency Calls	
	Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate PSAP.	Via E911 database, Sprint automatically and immediately connects the caller to an appropriate PSAP.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
	A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.	CAs pass along the caller's number to the PSAP when the caller disconnects prior to be connected to the emergency service.
δ 64.604 A.5	In-call Replacement of CAs CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10 minutes. STS CAs – 15 minutes.	 TRS and VRS CAs stay on the call for a minimum of 10 minutes. STS CAs stay on the call for a minimum of 15 minutes.
δ 64.604 A.6	CA Gender Preferences TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.	 Sprint users are able to request the gender of the CA. Sprint makes every effort to satisfy this request and to maintain the same gender during transfers.
δ 64.604 A.7	STS Called Numbers STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user. This information must be transferred to any new provider.	 Sprint offers STS users the option of maintaining a list of names and phone numbers. When the STS user requests a name, the STS CA will repeat the name and the number to user. Sprint will provide the STS user information to any new provider.
	Technical Standards	
δ 64.604 B.1	ASCII & Baudot TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.	 Sprint TRS communicates with Baudot and ASCII in all speeds that are generally in use. The following Baudot codes are available on Sprint TRS' platform: Baudot 45.5, Baudot 50, Turbo Code, and E Turbo Code.
δ 64.604 B.2	Speed of Answer	

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
	TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.	Sprint ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold.
	Abandoned calls shall be included in the speed-of-answer calculation.	Abandoned calls are included in the speed-of –answer calculation.
	Speed of Answer is to be measured on a daily basis.	Speed of Answer is measured on a daily basis.
	The system shall be designed to a P.01 standard.	Sprint's system is designed to the P.01 standards.
δ 64.604 B.3	Equal Access to IXCs	
	TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.	Sprint provides users with access to their IXC carrier through the Sprint Carrier of Choice program allowing for the same access that is provided to voice users.
δ 64.604 B.4	TRS Facilities	
	TRS shall operate everyday, 24 hours a day.	Sprint TRS is available 24 hours a day, everyday.
	TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.	Sprint has redundancy features that provide functional equivalency, including uninterruptible power for emergency use.
	Adequate network facilities shall be used in conjunction with TRS.	Sprint's network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
δ 64.604 B.5	Technology	
	No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities.	Sprint is the nation's leader in the development and offering of technological features for TRS. Sprint has introduced over fifty key product enhancements including Split Screen ASCII, Customer Database, Turbo Code, E Turbo Code/Dial Through, Gated VCO, Voice call progression.
	VCO & HCO technology are required to be standard features of TRS.	Sprint provides VCO and HCO technology as standard features as well as several variations on these technologies.
δ 64.604 B.6	Voicemail & Interactive Menus	
	CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal.	CAs keep the user informed and notify of the presence of recorded messages and interactive menus. CA positions have hot key functionality that electronically capture recorded messages and retain them for the length of the call.
	TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages.	Sprint does not charge for any additional calls necessary to complete call involving recorded or interactive menus.
	TRS will handle pay-per-calls.	Sprint was the first provider to process pay-per-calls (Texas, 1996).
	Functional Standards	
δ 64.604 C.1	Consumer Complaint Logs	
	States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.	Sprint maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution.
	States & TRS providers shall submit to the FCC by July 1 of	Sprint provides summaries of the logs, which indicate the number of

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
	each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.	complaints received for a 12-month period ending May 31st. Sprint has submitted annual summary of Consumer Complaints log report: June 1, 2002-May 31, 2003 June 1, 2003-May 31, 2004 June 1, 2004–May 31, 2005 June 1, 2005-May 31, 2006 June 1, 2006-May 31, 2007
δ 64.604 C.2	Contact Persons States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.	Sprint provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.
δ 64.604 C.3	Public Access to Info Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS. Conduct ongoing education and outreach programs to publicize availability of 711 access.	Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 access in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of TRS. Sprint regularly provides 711 dialing information in its education and outreach programs.
δ 64.604 C.4	Rates TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.	Sprint TRS users pay rates no greater than the rates paid for functionally equivalent voice communication services.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
δ 64.604 C.5	Jurisdictional Separation of Costs (i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations (ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism (iii) Telecommunications Relay Services Fund – To be administered by the National Exchange Carrier Association, Inc. (NECA)	 (i) Sprint follows FCC requirements in the jurisdictional separation of costs. (ii) Interstate TRS is recovered from all subscribers for every interstate service utilizing the shared-funding cost recovery mechanism. (iii) Sprint works with NECA for reimbursement of interstate minutes.
δ 64.604 C.6	Complaints (i) Referral of complaint, (ii) Intrastate complaint resolution, (iii) Jurisdiction of Commission, (iv) Interstate complaint resolution, (v) Complaint Procedures	 The Sprint TRS Customer Contact process is fully compliant with all FCC Requirements.
δ 64.604 C.7	Treatment of TRS Customer Info Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.	 Sprint transfers TRS customer profile data to incoming TRS vendors. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or revealed in any other way by Sprint, or Sprint employees.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
δ 64.605	State Certification Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.	Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.
Availability of SS7 Technology to TRS Facilities Transmittal of Calling Party Information	Concluded that TRS providers should have access to SS7 or similar technology to make Caller ID and other benefits available and facilitate provision of TRS. (¶16) Concluded that TRS providers are required to observe FCC's rules pertaining to Caller ID and call blocking services. (¶22) Concluded that when a TRS facility is able to transmit any identifying information to the network, the TRS facility must pass through, to the called party, the number of TRS facility, 711, or, if possible, the 10-digit number of the calling party. The identifying information passed through the TRS facility to the called party is to be determined by the TRS Provider.(¶25)	Sprint's SS7 platform supports Caller ID services. Sprint complies with all FCC rules pertaining Caller ID and call blocking services. Sprint's SS7 platform transmits the 10-digit number for local and toll calls. Sprint's SS7 platform also will recognize the ID blocking indicators.
Types of Calls	Concluded that the following call types are adopted as mandatory minimum standards of TRS. Two Line VCO Two Line HCO HCO-to-TTY HCO-to-HCO VCO-to-TTY VCO-to-VCO This requirement is waived for Internet Relay and Video Relay Services through December 31, 2007. (¶36)	Sprint has provided the VCO and HCO calling combinations since 1996.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
Handling of Emergency Calls	Required that all TRS facilities be able to pass emergency callers to the appropriate PSAP within twelve months of publication of this Order in the Federal Register (8/24/03). (¶42) This requirement has been waived for Internet Relay and Video Relay Services. (under separate Orders for SRO and VRS)	Sprint immediately connects emergency callers to an "appropriate" PSAP as defined by the FCC.
Answering Machine Message Retrieval	This feature allows a TTY user to retrieve voice messages left on his or her voice mailbox or voice answering machine by an incoming call from a third party. Concluded that the answering machine retrieval to be provided on interstate and intrastate basis by 8/24/03. (¶62)	Sprint has provided the Answering Machine Retrieval since 1996.
Call Release	Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the relay the conversation. Ruled that once the CA signs off, or be "released," after the two TTY parties are connected, at this point, the call ceases to be a TRS call subject to the per-minute reimbursement." (¶68) This requirement is waived for Internet Relay and Video Relay Services.(¶76)	Sprint has provided the Call Release feature since 2003. Once a call is "released" from the CA workstation, the call is no longer a relay call and accordingly will not be charged to the state customer.
Speed Dialing	Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile. This requirement is waived for Internet Relay and Video Relay Services.(¶76)	Sprint has provided Speed Dialing or Frequent Dialed Numbers feature since September 1, 1996.
Three-way Calling	Three-way calling feature is generally arranged in one of two ways. (¶73) 1. The TRS consumer may request	Sprint has supported three-way calling capabilities, from the customer's premises, since September 1, 1995.

FCC Order Ref. 90-571	FCC Requirement	Sprint's Commitment
	that the CA set up the call with two other parties or; 2. The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button. This requirement is waived for Internet Relay and Video Relay Services.(¶76)	

Appendix L: Sprint's Report to the FCC on VRS and IP Waivers

FCC Internet and Video Relay Service Annual Progress Report
April 16, 2007

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
1. STS	Waived through 1/1/08	STS is not possible over the internet. Voice over IP (VoIP) **REQUIRES** Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order. In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.	In research and development stage. Sprint is investigating and evaluating several VoIP to determine acceptable QoS levels to support STS calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived Indefinitely; No report required	NA	NA
2. Spanish Relay	NA	NA	NA	Compensable but non-mandated service.	NA	Sprint provides ASL to Spanish Video Relay Service.
3. Types of Calls	NA	NA	NA	Waived through 1/1/08	Voice over IP(VoIP) requires Quality of Service. QoS means that all the associated data packets	We are currently providing two-line VCO and HCO controlled at the agent

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					arrive in one contiguous stream and in order. In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. The internet cannot be controlled by any single user. There is, at this time, no universal, cooperative methodology to address the internet deficiencies. Sprint offers alternatives VCO and HCO solution by using second line (analog line) where the Video Interpreter asks for a second number to call back using three-way call feature. The procedure is similar to two-line VCO or HCO call.	position using IP or ISDN inbound from Video user and outbound POTS to Video User and outbound POTS to Voice user. One line VCO and HCO began in 2005. This is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.
4. Emergency Call Handling	Waived through 1/1/08	Internet Protocol network (IP network) does not support the Automated Number	Sprint implemented a "manual" (directory assistance lookup)	Waived through 1/1/07	Internet Protocol network (IP network) does not support the Automated Number	No additional information to submit beyond our recent submission to

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
		Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	process for 911 calls through Internet Relay. The technical challenge remains of tying an exact location to an IP address. No additional development has been made that would allow Internet Relay users to place 911 calls through Internet Relay.		Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP.	the FCC. Current options may restrict interoperability. An Emergency database is still in use today for subscribers who choose to register a profile; however, agents must verify the location of the caller, as the caller may not be at the same physical location as the profile indicates.
5. Speed of Answer	NA	NA	NA	1/1/07- 80% of all calls within 120 seconds (monthly).	Sprint is exceeding the 80/120 service level requirement that went into effect January 1, 2007.	Sprint will continue to meet the requirement measured on a monthly basis.
6. Equal Access to Interexchange Carrier	Waived Indefinitely; No report required	NA	NA	Waived through 1/1/08	The IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and without an ANI to charge back for tolls calls, Sprint cannot support equal access to interexchange	The technical challenge remains of tying an exact location to an IP address for VRS users. However, the very nature of the internet makes billing for toll calls obsolete.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					carrier features for Video Relay Service.	
7. Pay-per-call (900) Service	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Internet Relay end users to be billed for pay-per-call services.	Waived through 1/1/08	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Video Relay end users to be billed for pay-per-call services.
8. Voice Carry Over (VCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Voice carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line VCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POTS to Video User and outbound POTS to Voice user. One line VCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband connection at

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						end user equipment.
9. Hearing Carry Over (HCO) (one-line)	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Hearing carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint is currently providing two-line HCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POTS to Video User and outbound POTS to Voice user. One line HCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.
10. VCO – to - TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
			baudot protocols are not compatible.			because. the videoconferencing via internet or ISDN protocols are not compatible.
11. HCO – t o-TTY	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.
12. VCO – to – VCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and baudot protocols are not	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
			compatible.			ISDN protocols are not compatible.
13. HCO – to – HCO	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible.	Waived through 1/1/08	As explained in number three above, voice quality over the internet is not universally effective at this time.	Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible.
14. Call Release	Waived through 1/1/08	An Internet Relay caller utilizes IP data to place an inbound call. The Call operator connects the outbound dialing voice call utilizing Signaling System 7 (SS7). Since these two types of calls are not compatible, the call release feature is not technically feasible.	It is not technically feasible at this time to provide call release features with Internet Relay calls. However, Sprint will continue to investigate new developments to allow Internet Relay customers to use this feature.	Waived through 1/1/08	A VRS customer utilizes a video connection to make an inbound call. The VRS operator utilizes a voice channel (SS7) to make an outbound dial. Because the two types of calls are not compatible, the call release feature is not technically feasible. Also, in the VRS environment, we are currently unable to remove the Video Interpreter	It is not technically feasible at this time to provide call release features with Video Relay calls. However, Sprint will continue to investigate new developments to allow Video Relay customers to use this feature.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
					agent from the middle of the call when the inbound video caller reaches an outbound customer who also has video capability.	
15. 3-way Calling	Waived through 1/1/08	The current Internet Relay call environment does not support the capability to perform three-way calling initiated call from agent via Sprint IP.	It is possible for the customer to initiate a three-way call if he/she has conference calling capability. In this case, the operator does not need to perform the three-way calling function. However, the limitation is that Sprint's Internet Relay Service will handle only one TTY user (and unlimited number of voice users) when using three-way calling via relay service. It is possible to have 2-Line VCO via Sprint IP using user-initiated three-way calling.	Waived through 1/1/08	At this time, it is not technically feasible to provide a 3-way Video Relay call. Customers using VRS do not have the web-enabled ability to initiate 3-way video calls because of the limitations of end user equipment. Features of customer premise equipment are not under the control of the VRS provider, and therefore the VRS provider cannot control the establishment of a three-way call.	The voice customer is currently able to use the LEC-provided three-way calling feature. One or two of the three legs of the call can be engaged as they would without VRS being a part of the call. VRS is transparent to this process. The VRS agent who receives an inbound video connection has the ability to out dial to multiple voice parties to create a three-way call of which two parts are voice and one part is video. The VRS agent platform is however, unable to support a three way call

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
						between two video customers and one voice user at this time.
16. Speed Dialing	Waived through 1/1/08	Sprint's current Speed Dial system is supported by ANI driven customer profile. Without being able to identify the customer's ANI, Sprint is not able to access the preferred speed dial list.	Customers can maintain their own speed dial list on their computer and paste the phone number on the web prior to the call. The phone number will be pre-populated to agent's dialing window for efficient call processing.	Waived through 1/1/08	This service is currently available for VRS customers who choose to use our webcam based product. They can create a speed dial list online and greatly improve the efficiency and connect time with the outbound party through the Video Interpreter. Individuals using TV-based videophones do not have this web enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.	Individuals using TV-based videophones do not have this web-enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform.

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
17. Providing Service 24/7	NA	NA	NA	NA	NA	NA

Appendix M: Sprint Relay Fact Sheet

Sprint Relay
www.sprintrelay.com

Sprint is the leading provider of relay services in the United States so that those who are deaf and hard of hearing can have anytime, anywhere communications. With 16 years of experience in providing Telecommunications Relay Services (TRS), Sprint is the relay service provider for 31 states plus the Commonwealth of Puerto Rico, New Zealand and the federal government. Sprint has been awarded the following state TRS contracts:

Alabama	Indiana	New Mexico	Texas
Alaska	Illinois	New York	Utah
Arkansas	Massachusetts	North Carolina	Vermont
California	Minnesota	North Dakota	Washington
Colorado	Mississippi	Ohio	
Connecticut	Missouri	Oklahoma	
Delaware	Nevada	Oregon	
Florida	New Hampshire	South Carolina	
Hawaii	New Jersey	South Dakota	

TRS enables standard voice telephone users to talk to people who are Deaf, Hard of Hearing or Speech-disabled on the telephone. Under Title IV of the Americans with Disabilities Act, all telephone companies must provide free relay services either directly or through state programs throughout the 50 states, the District of Columbia, Puerto Rico and all of the U.S. territories. Sprint Relay's experience in the field provides the assurance that all services delivered will meet or exceed Federal Communications Commission mandates for TRS.

Sprint Relay Services

Traditional relay services involve a relay operator serving as an intermediary for phone calls between a deaf, hard of hearing and speech-disabled user and a hearing party. The TRS operator speaks words typed by a deaf user on a text telephone (TTY) or via the Internet and relays the hearing person's spoken response by typing back to the deaf user.

Emerging Technology:
Under the Americans with Disabilities, all telephone companies are required to pay a percentage of the money that they collect from their subscribers into a national telecommunications relay services fund. This interstate fund is administered by NECA (National Exchange Carriers Association).

Currently, two technologies are funded through NECA – video and Internet relay services. There is strong competition in the TRS industry due to the fact that no state contract is required in any state to process calls through the Internet.

Video relay services (VRS) provides American Sign Language (ASL) users with an attractive alternative that offers them the opportunity to communicate by video conferencing using ASL their native language, which may be preferred over the traditional TTY relay service. VRS requires users to have a personal computer or television monitor, a Web camera or videophone and high-speed Internet connectivity such as cable and DSL. Sprint Video Relay, powered by CSD (Communication Services for the Deaf), is a free service through the Internet that enables the deaf or hard of hearing user to communicate in ASL to a hearing or standard telephone user. Sprint Relay and CSD launched the first nationwide Video Relay Service in May 2002. To connect with a video interpreter, visit www.sprintvrs.com.

Sprint IP Relay is also a free service that combines TRS with the ease and ubiquity of the Internet, allowing users to make calls from any PC or selected Web-enabled Internet wireless devices without having to use traditional TTY equipment. Sprint IP Relay users also have the flexibility of using AOL Instant Messenger to access Sprint IP Relay. To connect using a website, go to www.sprintip.com. To connect using AOL Instant Messenger, send a 10-digit number to the screen name **SprintIP**. Both access methods will connect the caller to an experience Sprint Relay operator.

Sprint IP Wireless Relay is a new service that allows customers who are deaf, hard-of-hearing or who have a speech disability to use wireless relay services on a select number of wireless devices:

1) BlackBerry phones (with an operating system 4.0 or higher). Customers can use this service to communicate with any standard or mobile telephone user in the United States via a free downloadable application at www.sprintrelay.com/download/. Users simply select a contact from their address book or enter a phone number with accompanying text instructions to a Sprint IP Relay Operator.

2) PPC6700 devices – To download the free Sprint IP Wireless application, go to: www.sprintrelay.com/download/treo.

Sprint IP Wireless allows users to have the mobility to make a relay call when they need to without a TTY or computer and can be assured the connection is with an experienced Sprint Relay operator.

Relay Conference Captioning℠ , developed by Caption Colorado, combines real-time captioning and standard relay service to provide relay conference captioning calls for deaf and hard-of-hearing individuals (in participating Sprint Relay state programs). By using an Internet Text Streaming platform supported by skilled captionists, RCC provides highly accurate real-time captioned text for any live conference call.

For more information, please visit www.sprintrelay.com

Appendix N: Copy of TSP Press Release

Media Contact:
Stephanie Taliaferro, 913-794-3658
stephanie.c.taliaferro@sprint.com General Press Release

Sprint Completes Voluntary Telecommunications Services Priority Program Enrollment for Relay Network

OVERLAND PARK, Kan. – November xx, 2005 – Sprint (NYSE: S) today announces that it has completed the final milestone in enrolling Sprint's telecommunications relay service (TRS) in the FCC's Telecommunications Service Priority (TSP) Program. Sprint TRS, communications services available for individuals who are deaf, hard of hearing or have a speech disability, is comprised of a network of call centers geographically disbursed throughout the United States.

Effective October 31, 2005, all 14 Sprint Relay call centers were successfully activated under the TSP Program. Unlike other TRS providers, Sprint's TRS network is designed to reroute traffic to other Sprint Relay centers across the country to continue uninterrupted service with minimal customer impact.

"In less than five months, we were able to complete the implementation of the FCC's TSP program," said Mike Ligas, director of Sprint Relay. "Sprint is dedicated to providing effective communications services for individuals who are deaf or hard of hearing and we recognized the urgency to ensure reliable communications during emergency situations."

In 1988, TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service requests, such as after a natural disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

Sprint Relay Portfolio of Services
Sprint has 15 years of experience in providing relay services to persons who are deaf, hard of hearing or deaf-blind or who have a speech disability to communicate with hearing persons on the phone. Sprint offers relay services through an intelligent platform to the federal government, 30 states, the Commonwealth of Puerto Rico and New Zealand. Sprint's experience in the field provides the assurance that all

Sprint Relay services will meet or exceed Federal Communications Commission requirements for telecommunications relay services (TRS). Relay service is available 24 hours a day, 365 days a year, with no restrictions on the number of calls placed or call length. For more information, visit www.sprintrelay.com.

Sprint Government Systems Division (www.sprint.com/government) is based in Reston, Va., and offers the full range of Sprint product and service offerings for federal and state government customers.

About Sprint Nextel

Sprint Nextel offers a comprehensive range of wireless and wireline communications services to consumer, business and government customers. Sprint Nextel is widely recognized for developing, engineering and deploying innovative technologies, including two robust wireless networks offering industry leading mobile data services; instant national and international walkie-talkie capabilities; and an award-winning and global Tier 1 Internet backbone. For more information, visit www.sprint.com.